

Whittlesey Neighbourhood Plan Reg. 16 Publication: Representations Received

FDC published the draft Whittlesey Neighbourhood Plan for the period 8th July to 1st September 2022. The table below sets out all comments received during the publication period. Comments are arranged alphabetically by name of organisation, or by surname where submitted by an individual.

Name	Date received	Comments
Sharon Bedford	31st August 2022	<p>As a resident of Whittlesey for nearly 66 years I am disappointed that the council are still talking and not initiating a bypass/relief Road some 60 odd years after it was first muted. Indeed instead of 'getting on' with the construction of a bypass we had our town cut in half to give HGV's better/easier access thus destroying the history of the town in its wake. I would go so far as to say if it was proposed today the cutting of the town in half wouldn't be allowed. It is in this vane that I beseech you to build a relief road as soon as possible. I live on Eastrea Road and have done for 35 years now and the traffic has increased a 100 fold by HGV's and by the new housing estates. Our air quality along this road is regularly compromised!</p> <p>Whilst I understand the need for housing at the moment the town cannot sustain the extra traffic, the school places, the sewerage and water system but most of all the lack of available GP appointments. I am led to believe that local councillors have approached New Queen Street Surgery regarding lack of available appointments for the townsfolk but they state there isn't a problem, however, I would like this to go on record, there is a problem a major one that needs addressing! (another point would be are you ruining the character of the town by having all this housing?)</p> <p>A better bus/coach service would be greatly appreciated, however, as for a park and ride, which is a great idea, where would you place this as the car parks near the bus station at the moment are regularly full with nearby residents cars.</p> <p>Regarding all the other points in the plan, I feel it is a step in the right direction.</p>
Alan Bessant	27 th August 2022	<p>Please see below my comments/ feedback on the Whittlesey Neighbourhood Plan.</p> <p>Under Section 82 of the Environment Act 1995 every local authority has an obligation to regularly review and assess air quality in its area and to determine whether air quality objectives are likely to be achieved. Also, under section 79 of the Environmental Protection Act 1990 every local authority has a duty to monitor its area for statutory nuisances such as dust and odour.</p>

		<p>LP16 in the 2014 Fenland local plan states that for a high quality environment it identifies, manages and mitigates against any existing or proposed risks from sources of noise, emissions, pollution, contamination, odour and dust, vibration, landfill gas and protects from water body deterioration.</p> <p>Since the Fenland plan was created the Environment act 2021 legislation has been enacted, which gives Government more power to set stronger binding targets for pollution which Defra is currently consulting on – this will hold public bodies to greater account against enhanced pollution measures.</p> <p>Despite the stated Whittlesey plan vision of a strong retail environment with a bustling market square selling local produce, Whittlesey has in fact been attracting a number of low-skilled dirty, dusty, noisy industries with a significant potential to cause pollution and increase HGV traffic. Our current MP has even confirmed a criminal investigation is underway for the dumping of 122 thousand tons of illegal waste in the town. Residents are so unhappy they have been forced to form their own groups to lobby for better monitoring and enforcement.</p> <p>Given the above background it is disappointing that there is no focus on pollution control or monitoring and enforcement in the Whittlesey Neighbourhood Plan. This is critical to the long-term well-being of the residents and for attracting younger families and high skilled jobs to the area.</p> <p>Give the age demographic in the baseline data and the ageing population’s vulnerability to pollution, combined with the growing concerns of recreational drugs use in the younger population, it is also a surprise that the WTC long term plan appears to consider the town is in good health. It would be good to see current Health Authority statistics to back up this statement compared to national averages. The ageing local population situation will also evolve over the next 15 years – has this been modelled and factored into the plan?</p> <p>Also is anything being considered in the plan to tackle the growing drugs issue. One new local industrial employer (who tests staff for drugs and set up in 2022) said they had struggled to train and retain local staff even in low skilled blue-collar roles, due to the high percentage of drug positive tests.</p>
Sue Brooker	21 st July 2022	<p>I am writing to you as I’m getting more and more alarmed at the amount of HUGE vehicles coming through Whittlesey.</p> <p>These vehicles are up and down ALL day and night. Loud sat nav giving instructions surely this isn’t right in a residential area. Are their NO time zones???</p> <p>I have been told the width of the road is adequate and is fit for use to accommodate these Giant lorries .</p> <p>Is this Not a conservation area? Whittlesey is a Historical town and needs to be recognised for this reason.</p> <p>My question is, Why do some of the huge lorries have to mount the pavement to get past each other then ??</p> <p>The road has crack appearing with most properly the constant weight and the up and down of huge lorries.</p>

		This is a "Accident hot spot waiting to happen."
Clare Bull	23 rd July 2022	<p>I have just scanned through the neighbourhood plan and wanted to raise the lack thought around infrastructure for the proposed need new homes/ affordable housing.</p> <p>The document rightly indicates the need for additional and affordable housing, however there is hardly any mention of services to support this.</p> <p>A healthy community needs access to medical care, the two practices we currently have are stretched to say the least and getting an appointment is increasing difficult. There is no mention of how the practices will be supported to grow, especially as you indicate the need for housing for elderly individuals.</p> <p>I am aware that New Road Primary and Sir Harry's have both had some development but with the addition of more houses (100's on Eastrea Road alone), all the schools will be at capacity soon if they are not already. Children from the villages of Coates, Pondersbridge and Turves will soon have no chance of getting into Sir Harry's. Where do schools feature in the plan?</p> <p>There does not seem too much in the plan for younger members of the community? We are seeing a rise in anti-social behaviour but apart from an occasional youth club some table tennis tables and a tired looking skate park, what is there for young people to do? Where is this in the plan? It mentions pitches and areas for exercise but that could just be a field, we have that already. Why doesn't the plan have a revamp of the Astro pitches so there can be a 5 a side league all year, why no outdoor gym equipment or a trim trail? Consult with young people don't just stick a link on Facebook!</p> <p>In general I think the plan is playing nicely into the hands of developers, with little thought of how this will impact residents.</p>
Elizabeth Crosby	28 th August 2022	<p>Below are my comments on the Whittlesey Local Plan.</p> <p>I am disappointed that I can find no mention of measures being taken to combat air pollution within Whittlesey and the surrounding area. Mention is made of HGVs trundling through Whittlesey to reach the industrial estate and the inconvenience to local residents, but no urgency to provide the southern relief road, which would benefit all residents of Whittlesey.</p> <p>Whittlesey has an aging population, with their own health needs, but the health of younger people and children is not mentioned. The increasing number of lorries travelling through Whittlesey and the dirty, smelly industry being given planning permission at Saxon Pit, with all the associated noise, dust and odours can only have a long term, detrimental effect on the health of Whittlesey residents. All the beautiful homes and parks will not make up for ill health and shortened lives!</p>
Martin Curtis	1 st Sept 2022	I have been through the proposed Neighbourhood Plan for Whittlesey and, whilst it contains much that is good, there are a few areas where I think it would benefit from some improvement/further thought and I would like to suggest them.

		<ol style="list-style-type: none"> 1. I do not believe that the windfall policy in Fenland's currently local plan is in accordance with the current NPPF and it has done significant harm to Whittlesey and the rest of Fenland because of the way it has allowed and enabled significant growth that should have been managed through strategic allocations to happen in an unplanned way, not only is this unsettling for residents, it stops statutory authorities properly planning infrastructure to match growth. I would like to see the neighbourhood plan propose an alternative windfall which is more in accordance with the usual norms - i.e. a maximum of 10 homes. 2. Whilst there is some good comment about building design in the plan, one of my concerns is that box style housing with little design flair has become the norm in Whittlesey - probably because developers would claim that this is the Whittlesey vernacular. However, the lack of variation to that design type harms the character of the town and I would prefer a policy that specifically challenges this and enables different building styles. 3. Whilst there are some good measures to protect current open spaces, there is a specific character to the Avenues which is to its benefit, and that is space between buildings, which includes the garden space. That open character and feel is what, fundamentally stops the avenues from having a look and feel of a traditional council house estate and I believe a specific policy to protect that character would be of benefit. 4. Public Transport. The major focus on public transport is quite rightly focused on access to Peterborough. However, there is significant benefit to better public transport or the rest of Fenland and indeed, further beyond to Cambridge - which has a very unique economy which Whittlesey residents would benefit from having better access to. Some of this is about the improvements to rail services that are part of the aspirations for the local plan, but I believe we can do better than this - especially as the technology around public transport develops towards demand responsive and driverless services - which would make access to Cambridge far more affordable. 5. I believe a specific policy that focuses on using S106 to create new schools in Whittlesey rather than growing existing schools would be of benefit to the Town. <p>I hope this is helpful.</p>
Lynda Dawn	21 st July 2022	<p>Disappointed to see the waste and minerals plan has not been incorporated into the local plan particularly as waste is now having such an impact on Whittlesey.</p> <p>The plan paints Whittlesey as a quaint market Town unfortunately this is no longer the case we have a large waste site as you enter Whittlesey which is affecting residents not only with the pollution it creates vis noise and dust but also increased lorry movements in order to supply the waste being brought in from all over the UK.</p> <p>The waste site looks as though it will continue to expand under the euphemism "science park". Unfortunately to date no public consultations have taken place as preferred route of consultation is a presentation to Whittlesey Town Council.</p> <p>How can a large waste site that impacts Whittlesey to such a degree not be mentioned in full and expansive detail?</p>

		This plan presented is a paper exercise not actually providing much in the way of real improvements for Whittlesey.
Cheryl Furness	18 th July 2022	<p>Any plans for Whittlesey should, at the very least, include cleaning up the area. I am not talking about general waste but the following:</p> <p>I have lived in Whittlesey for 45 years and the air has become more and more dirty and smelly, it has never been as dirty as it is now. Examples are:</p> <ul style="list-style-type: none"> - the car is cleaned and overnight it is full of muddy dust - windows and frames are cleaned and the following day they are covered in muddy dust - the main A605 road is absolutely filthy. The majority of the dirt is from the sides of the road where the soil has built up above the kerb stones and contributes to making the road very muddy and dirty. The soil needs to be cut back and resurfaced and the road cleaned. - the Brickyards and other industrial areas are creating a more dirty environment and this is insufficiently controlled - the business owners in Whittlesey need to be encouraged to improve their properties to make them more presentable. Too many business buildings in Whittlesey are in a very poor state of repair and are very unkept - too many lorries are going through Whittlesey which is contributing to the poor air quality and dirt - it has been officially acknowledged that the air quality in Whittlesey is very poor but very little is being done to address the issue from a Health & Safety view - the whole area needs to be cleaned up - industrial businesses should be encouraged to clean up their premises <p>For Whittlesey to progress and improve it's image, it needs to start with the basics, fancy plans are all well and good but for the area to be more attractive to residents, visitors and businesses, it needs to improve its image..</p> <p>Over the years I have had a number of visitors from outside of the area and many of them have commented what a dirty place Whittlesey is.</p> <p>Whittlesey will never be an appealing place to visit if it is not made a cleaner place to be.</p> <p>I hope that you will take my comments into account.</p>
Richard Hibbert	21 st July 2022	<p>A couple of thoughts.</p> <p>I welcome the overall thrust of the plan but it would seem that because of the time taken to develop the plan it has been overtaken by events. My main concern is with regard to the southern relief road.</p> <p>That would be all well and good but would do little to improve the access to the Station Rd Industrial Estate.</p> <p>It would of course depend on the detail of any route but in all probability vehicles wishing to access the Industrial estates would still end up coming through the town.</p>

		<p>A more viable answer in my opinion would be an Eastern Relief road linking the A605 to Benwick Rd from a point just west of the Nags Head in Eastrea and utilising the existing farm level crossing. This would enable the existing crossing on Wype Rd to be downgraded in effect making the south of Eastrea into a large cul de sac.</p> <p>I look forward to seeing how the plan moves forward.</p>
<p>Fenland District Council</p> <p>Submitted by Gareth Martin Senior Development Officer – Planning Policy</p>	<p>1st Sept 2022</p>	<p>This note sets out Fenland District Council’s (FDC) response to the Draft Whittlesey Neighbourhood Plan (WNP) which was submitted to FDC in June 2022.</p> <p>Having carefully reviewed the Draft WNP, FDC considers it capable of satisfying the basic conditions and other relevant legal obligations, and consequently makes only limited comments in this representation. The majority of the comments relate to the clarity of the text in the main document and supporting maps in the Appendices.</p> <p>1.4 – Understanding the Community</p> <p>It would be helpful if the WNP could provide some dates about the various stages of consultation in order for the development of the plan to have some context.</p> <p>Paragraph 3.13 and Map 1 at Appendix A – For clarity the text should refer the reader to Maps 1A and 1B at Appendix A. Furthermore, the notations in the key of the four maps should be consistent for the various flood zones and in line with the Environment Agency notations i.e. Flood Zones 1, 2, 3A and 3B which would be clearer and more accurate than those shown.</p> <p>Policy 1: Spatial Strategy</p> <p>Bullet point b) – The first line could be read that no development should be located other than on the East side of the town. It is therefore suggested that this line be amended with additional wording as follows: ‘<i>Significant</i> new housing development should be located <i>predominantly</i> East of the town’</p> <p>Bullet point d) – There are two employment areas in Whittlesey but only one is shown on Map 2 in Appendix A. The sizeable employment area abutting the west of the town should also be indicated on a map.</p> <p>Bullet point e) – To ensure the policy is effective, it would be preferable if the Neighbourhood Plan could clarify what scale and types of development are considered appropriate in these locations.</p> <p>Policy 3: Primary Retail Frontages</p>

Consistent terminology should be used throughout this policy i.e. the policy refers to Primary Retail Frontages although in the main Primary Shopping Frontages (PSFs) are discussed but reference is also made to PRFs.

Paragraph 3.5.1 – this paragraph could be more appropriately worded for clarity.

Policy 5: Local Green Spaces

There are no objections raised to the inclusion of any of the sites as LGS. However, for accuracy and legibility changes should be made to the accompanying Map 4 at Appendix A:

- Bass 10: Larkfleet (Sorrel Avenue) – the site is more extensive on the ground than that shown on the map and should be accurately indicated.
- Latt 2: Sycamore Road – The notation for Latt 2 should be re-positioned so as not to conflict with the base map notation.
- Latt 5: New Road Allotments - The notation for Latt 5 should be re-positioned so as not to conflict with the base map notation.
- StM 2: Bower River – It would be more accurate (to reflect official descriptions) to describe this area as Briggate River/The Bower (Towing Path).
- Ston 1: Snowley Park – The site area on the map does not reflect the situation on the ground and should therefore be accurately shown.
- Ston 5: Yarwells Headlands - The site area on the map does not reflect the situation on the ground as the area of public open space continues on the north side of the road and should therefore be accurately shown.
- Ston 6: Kings Dyke Nature Reserve – The reserve is almost double the size shown on the map and should be amended to reflect the situation on the ground.

Policy 6: Country Park

4th bullet point- It is unclear on the purpose of the words ‘through urban areas’ in the context of this policy and would suggest that these be removed.

Policy 7: Design Quality

Section a) 2nd bullet point – ‘existing convenience of neighbours’ may be better expressed as ‘existing *amenity* of neighbours’

Mud Walls

Paragraph 3.8.8 – Map 7 should also include a key explaining the reference numbers on the map.

Policy 8: Historic Environment

The second paragraph is not clear and suggest should be re-drafted for clarity, potentially along these lines: “...and their settings *must ensure that the assets are* conserved and enhanced in accordance with....”

Final paragraph – would suggest that the policy should also refer to the Coates Conservation Area.

Paragraph 3.10.5 – to better explain this sentence would suggest that the following words are added: ‘Coastal flooding presents a potential flood risk to the Neighbourhood Area *because the tidal reach of the River Nene is as far as the Dog-in-a-Doublet Sluice to the north of Whittlesey.*’

Paragraph 3.10.8 – This paragraph should be clarified to make it clear that the applicant is responsible for submitting the Sequential Test, possibly along these lines: ‘..... and manage any residual risk *through the applicant submitting a Sequential Test* and applying the Exception Test where appropriate.’

Policy 11: Coalescence of Villages

Map 8 – It would be helpful if the green buffer was also indicated north of the A605 between the villages of Coates and Eastrea (opposite the proposed green buffer on the south side of the road) utilising the Gray Fern Park Equestrian Centre site which has historically been used to maintain some form of separation between the two settlements.

Paragraph 3.12.5 - As there are two industrial areas in Whittlesey and for clarity, the first sentence should be amended to: ‘... locally to the *Station Road* industrial area....’

Paragraph 3.12.7 – Add additional line at the end with regard to the Kings Dyke crossing: ‘*This was completed in July 2022.*’

Policy 12: Delivering Sustainable Transport

Remove 6th bullet point i.e reference to the Kings Dyke crossing.

Policy 13: Adapting to and Mitigating Climate Change

Section a) – The second paragraph is not a planning matter and should therefore be removed.

Section c) – It would be better if the policy wording could include the following: ‘...will be generally supported *provided they do not conflict with other policies in the development plan*’

		<p>Section f) – Rather than implying all proposals it might be better to say: ‘<i>Larger scale</i> proposals should seek opportunities for on-site food production....’</p> <p>Other Matters</p> <p>There are minor typos at paragraphs 1.4.2, 3.4.2, 3.6.3 and first bullet point of Policy 10.</p> <p>Strategic Environmental Assessment (SEA)</p> <p>FDC is the “responsible authority” for the purpose of SEA. FDC subjected the WNP to a SEA screening exercise during the plan’s preparation, which involved consultation with statutory bodies.</p> <p>FDC has issued a Determination Statement which confirms it is satisfied that implementation of the WNP is not likely to give rise to significant effects on the environment.</p> <p>Conclusion</p> <p>In conclusion, FDC considers that the Whittlesey Neighbourhood Plan appears capable of satisfying the basic conditions and other relevant legal obligations.</p>
<p>Hodsons Sub- mitted by C Stephen Hodson</p>	<p>28th July 2022</p>	<p>I have read through the above plan and associated documents and would like to make the following comments:</p> <p>The WNP states that it is a “Planning document that will help guide development in Whittlesey in the period up to 2040”.</p> <p>Under Policy 1 – Spatial strategy it states”.....Coates and Eastrea are markedly smaller in scale....Likely to offer limited opportunities for development”. Yet, under the present 2014 Local Plan a large estate of 60 dwellings, very urban in style, has been approved in Coates off Coates Road the A605.</p> <p>Under Policy 5 – Local Green Spaces. StA3 in Church Street, Whittlesey is included under the “Local Green Spaces Assessment” this parcel of land is designated as a “Local Green Space”. A prerequisite of having this designation is that it is to have public access. This is not the case. This land belongs to Fenland District Council and in my view should be allocated for affordable housing due to its location in the heart of town. Or it could be used by the people of Whittlesey as open recreational space.</p> <p>Under Policy 12 – Delivering Sustainable Transport – Heavy commercial movements it states “the A605 forms part of “Cambridgeshire Strategic Freight Route”. This is not strictly accurate as it is only designated as the “advisory” route, it is not mandatory.</p>

		<p>In 2020 the Growing Fenland Master Plan was produced. Please ensure all the agreed requirements of this plan are included in the WNP. In particular the Southern Relief Road.</p> <p>I look forward to hearing from you.</p>
<p>Matrix Planning Ltd</p> <p>Sub- mitted by Gordon Smith</p>	<p>31st August 2022</p>	<p>The following comments are made on behalf of an active local developer with interests in various completed and new housing sites in the district.</p> <p>Our comments as follows are generally supportive.</p> <p>2. Objectives.</p> <p>Supported. Postland Developments is presently engaged in providing new high quality homes in Coates, a sustainable location.</p> <p>3. Policies</p> <p><u>Policy 1e: Spatial Strategy.</u> Support the recognition of Coates as a Growth Village.</p> <p><u>Policy 1f: Sites adjoining the built area of Coates.</u> Support given to items i (flood risk) and ii (visual impacts).</p> <p><u>Policy 2f Meeting wider needs</u> Comment. Whilst we welcome the support given to self-build housing, the Policy might encourage it by reminding readers that national policy exempts self-build units in major schemes (i.e. 10 or more) from counting toward affordable housing provision. NPPF section 65c applies.</p> <p><u>Policy 11: Coalescence of Villages</u> Support. <i>This policy is supported</i> as it helpfully and expressly explains where development is, and is not, allowed in sensitive gaps between villages. It does this by presenting a new concept for Fenland District of a <i>Green Buffer</i> (Map 8). It should be noted that the emerging Draft Local plan (August 2022) includes <i>Site LP51.03</i> (a residential allocation) outside but on the edge of this buffer. Comment. It would be helpful, but not essential, if the Neighbourhood Plan reflected the settlement boundaries introduced by Policy LP1 of the August 2022 Draft Local Plan.</p> <p>Thanks.</p>

<p>National Grid</p> <p>Sub- mitted by Tom Wignall of Avison Young</p>	<p>1ST Sept 2022</p>	<p>National Grid has appointed Avison Young to review and respond to Neighbourhood Plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.</p> <p>About National Grid</p> <p>National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators across England, Wales and Scotland.</p> <p>National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.</p> <p>National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States.</p> <p>Proposed development sites crossed or in close proximity to National Grid assets:</p> <p>An assessment has been carried out with respect to National Grid's electricity and gas transmission assets which include high voltage electricity assets and high-pressure gas pipelines.</p> <p>National Grid has identified that no assets are currently affected by proposed allocations within the Neighbourhood Plan area.</p> <p>National Grid provides information in relation to its assets at the website below.</p> <ul style="list-style-type: none"> • www.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/ <p>Please also see attached information (below) outlining guidance on development close to National Grid infrastructure.</p> <p>Distribution Networks</p> <p>Information regarding the electricity distribution network is available at the website below: www.energynetworks.org.uk</p> <p>Information regarding the gas distribution network is available by contacting: plantprotection@cadentgas.com</p> <p>National Grid is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.</p> <p><u>Electricity assets</u></p> <p>Developers of sites crossed or in close proximity to National Grid assets should be aware that it is National Grid policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.</p>
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Natural England	27 th July 2022	Thank you for your consultation on the above dated 08 July 2022.

<p>Sub- mitted by Dominic Rogers</p>	<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.</p> <p>Natural England does not have any specific comments on this draft neighbourhood plan.</p> <p>However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan.</p> <p>For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.</p> <p>Annex 1 – Neighbourhood planning and the natural environment: information, issues and opportunities</p> <p>Natural environment information sources</p> <p>The Magic¹ website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, National Parks (England), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones). Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available here².</p> <p>Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found here³. Most of these will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.</p> <p>National Character Areas (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found here⁴.</p> <p>There may also be a local landscape character assessment covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.</p>
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If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty (AONB)**, the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the MagiC5 website and also from the LandIS website⁶, which contains more information about obtaining soil data.

Natural environment issues to consider

The National Planning Policy Framework⁷ sets out national planning policy on protecting and enhancing the natural environment. Planning Practice Guidance⁸ sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed here⁹), such as Sites of Special Scientific Interest or Ancient woodland¹⁰. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed here¹¹) or protected species. To help you do this, Natural England has produced advice here¹² to help understand the impact of particular developments on protected species.

Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 171. For more information, see our publication *Agricultural Land Classification: protecting the best and most versatile agricultural land*¹³.

Improving your natural environment

Your plan or order can offer exciting opportunities to enhance your local environment. If you are setting out policies on new development or proposing sites for development, you may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development. Examples might include:

- Providing a new footpath through the new development to link into existing rights of way.
- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to encourage wildlife.
- Adding a green roof to new buildings.

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision.
- Identifying green areas of particular importance for special protection through Local Green Space designation (see Planning Practice Guidance on this ¹⁴).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks, changing hedge cutting timings and frequency).
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

¹ <http://magic.defra.gov.uk/>

² <http://www.nbn-nfbr.org.uk/nfbr.php>

		<p>3 http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx</p> <p>4 https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making</p> <p>5 http://magic.defra.gov.uk/</p> <p>6 http://www.landis.org.uk/index.cfm</p> <p>7 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/807247/NPPF_Feb_2019_revised.pdf</p> <p>8 http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/</p> <p>9 http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx</p> <p>10 https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences</p> <p>11 http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx</p> <p>12 https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals</p> <p>13 http://publications.naturalengland.org.uk/publication/35012</p> <p>14 http://planningguidance.planningportal.gov.uk/blog/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space/local-green-space-designation/</p>
<p>Public Health Whittlesey</p> <p>Submitted by Alan West of Cambs County Council</p>	<p>2nd August 2022</p>	<p>Evidence and consultation</p> <p>Thank you for consulting Public Health with regard to the Draft Neighbourhood Plan. The policies within the NP are clearly centred on a strong evidence base. Examples include: the 2017 Housing Needs Assessment, population data verifying aging population and travel related data such as the number resident’s reliant on the car and those without a car.</p> <p>Encouragingly the NP process is founded on a compelling collaboration with the local residents, capturing the issues of importance to those of all ages, using a number of innovative measures such as: the distribution of a specific questionnaire aim at young children and the involvement of students from Sir Henry Smith school. This is to be commended as an example of good practice. In addition a number of workshops, designed to provide further strong evidence for the NP policies and helped to better understanding the key issues facing residents in the town and the villages of Coates, Eastrea, Pondersbridge, Turves along with the settlements at Kings Dyke and Kings Delph.</p> <p>The consultation process for the NP has resulted in a clear and concise document that will usefully support the future development of Whittlesey and the surrounding settlements.</p> <p>Objectives of the Neighbourhood Plan</p> <p>Many of these objectives support the need to address the wider determinants of health. These include:</p>

- 2.21 Provide new high-quality homes in appropriate sustainable locations that meet the need of the Neighbourhood Area without compromising the distinctive and attractive setting of the Town and Villages, or their natural environment, securing high-quality development in all new schemes.
- 2.25 usefully recognises the need for improved East West connectivity, along with the impact of HGV's in residential areas.
- 2.27 Recognises the need to encourage active travel and
- 2.28 the need to promote health and wellbeing, All these objectives are welcomed by Public Health and have the potential to improve the health and wellbeing of local communities.

We welcome these early statements in the NP. However, we would encourage the NP partners to consider to reinforce the importance of affordable housing in paragraph 2.21 as this is clearly a key issue for the local community. Despite being mentioned later in the document in the "Headlining" section and in the supporting NP text, we believe the issue of affordable housing is so important the further emphasis early in the NP is necessary.

Comments on the Policies and the supporting text of the Neighbourhood Plan

Policy 1: Spatial Strategy

The supporting text points out the significant contribution made by Whittlesey's to the requirement for housing in Fenland, along with the constrains on future supply of new dwellings and infrastructure, caused by flood risk in paragraphs 3.1.1, and 3.1.3 and 3.1.5. These constraints also impact on local transport infrastructure. The NP explain that the large number of railway crossing result in delays on the road network for commuters' journeys and logistics deliveries. An increasing issue with the frequency of both passenger and freight trains.

Policy 2: Local Housing Need

Paragraph 3.2.2 appropriately states that this policy needs to cater for all sectors of the housing market providing families with access to suitable housing as well as importantly meeting the needs of the increasing numbers of elderly residents. *"Homes should enable older people to live independently for as long as possible."*

We welcome the statement in paragraph 3.2.4 *"increasing the provision of affordable housing is a crucial aim of this Neighbourhood Plan. New development should provide opportunities for young people to access the housing market."*

Furthermore, the *Policy 2 Local Housing Need* – clearly sets out the need for affordable housing, evidenced by the "Housing Needs Assessment". Along with the importance of accessibility and adaptability of new homes to meet the communities, changing needs over time such as reduced mobility. Moreover, we welcome recognition that locating residential care homes and supported housing schemes where they provide good access to local services/ facilities can significantly affect the overall sustainability of the development and quality of life of residents.

Policy 3: Primary Retail Frontages

The NP partners may wish to consider added further supporting text for Policy 3, potentially include references to importance of managing the quantity of hot food take aways in the town centre. Elsewhere in the UK a number of councils, have used Supplementary Planning documents (SPD's) to support the planning process by providing guidance on these issues. Currently there are no such specific policy in place, in either the Local Plan or SPD's within the Fenland area. This is despite the Local *Health Profiles* showing over 20% of children in year 6 are obese. However, Public Health would welcome such policies and support their development.

However, the Fenland Local Plan does include a specific Policy LP2 "Facilitating Health and Wellbeing of Fenland Residents", where the impact of obesity and the importance of healthy diet and exercise are raised. The NP partners may wish to consider making reference to this Local Plan policy in the final NP. Thereby strengthen the links to the Local Plan in respect of this and other health related Policies.

Currently should the NP partners wish to consider at a later stage seek to limit the number of hot food take aways, without policies in place this could be a challenge with little or no one control. In many cases, elsewhere in the UK the number of fast-food outlets has had adverse impact, particularly on the historically frontage of buildings and issues with litter and hence the importance of specific policies.

These measures and additions to the text would complement the following paragraphs. Both of which we fully support.

3.3.2 healthy food, care and health facilities, and safe environments, lie outside the direct influence of healthcare.

3.3.8 The Council is determined to turn around this situation and promote access to healthy and local food, which also has the additional benefit of being low carbon food due to the low mileage such foods have travelled.

Policy 4: Open Space

The "under-provision of accessible open space, outdoor sports and children's play provision in Whittlesey and its villages" was highlighted as a key concern of residents during the NP consultation process. We would recommend that the NP partners consider the conclusion of the Public Health England report *Improving Access to Greenspace 2021* in relation to both policies 4 & 5 as both green space and open space are critical community assets.

Consequently, we would suggest that Policy 4 be amended, particularly paragraph B. This policy currently requires developers "to provide off-site open space when on site provision is not possible." It would be useful from the perspective of encouraging physical activity and general health and wellbeing, if all local residents could access any new open spaces. Not simply "accessed by residents of the new residential areas". We would suggest the revision of paragraph B to include "accessed by all residents not only those from the new residential areas."

Policy 5: Local Green Spaces

We welcome the inclusion in the NP of the Green Space assessment and the designation of 32 sites. In our view this is particularly important in Whittlesey, where the majority of green space on the edges of the town and green space in close proximity of the town centre and in many residential areas is quite limited. Historically, land has been allocated to other uses, such as business, residential and agriculture and as a result access to the remaining all important “Green Lungs” can be problematic, particularly for elderly or mobility impaired residents.

Policy 6: Country Park

We welcome the inclusion of a specific policy describing aspirations for a country park, with a preferred for a 54 acre site South of Eastrea Rd, along with the Town Council support for any other suitable site that might come forward.

It is encouraging that the NP recognises the importance of the county parks location being accessible by a range of transport modes.

This will contribute to the sustainability of the site and encourage active travel potentially improving the health and wellbeing of the local residents. It is also essential for country park is accessible to all users, designed with both the elderly and those with physical disabilities in mind. Being accessible to all generations should be a principal factor the location and design of the country park.

This policy sets out 8 definitive measures that will be delivered by the introduction of a county park, the majority of which will benefit physical and mental wellbeing. If the site is “*accessible by a range of transport modes*” this will benefit the wider community across Cambridgeshire, attracting visitors from such as Peterborough and March. The NP partners may wish to add further text to stress these wider benefits, helping to provide a stronger links to the Local Plan policies.

Policy 7: Design Quality

The supporting text to this policy includes paragraph 3.7.8 “*In determining applications, consideration should be given to outstanding or innovative designs that promote high levels of sustainability or help raise the standard of design more generally in an area, so long as they fit in with their surroundings’ overall form and layout*”. This section would benefit from the inclusion of a table incorporated within many other NP’s, clearly illustrate the importance of good design on the wider determinates of health. Linking to the “*Building for a Healthy Life*” guidance that has been written in partnership with Homes England, NHS England and NHS Improvement, containing 12 considerations organised across 3 themes that illustrate the health benefits.

Public Health welcomes the acknowledge in this policy of a number of key issues which will benefit health of the communities in Whittlesey and the local settlements. In particular section a) of this policy which contains reference to: *Enable suitable and safe access for vehicles, pedestrians, and cyclists; Maximise energy efficiency and support the provision of renewable energy technologies, providing green areas and other public spaces, and support the provision of local facilities and infrastructure and Include measures for the long-term management and maintenance of assets and services.*

We also welcome the design issues raised in section f) of this policy including: *create places that are safe, inclusive and accessible, through proposals which: Contribute to the achievement of a sustainable and mixed community; Promote healthy lifestyles; Are accessible to all users; Encourage social interaction between users of the site; Reduce fear of crime and adapt to and mitigate the effects of climate change.*

We would however, suggest the inclusion within this policy of reference to both the benefits of property insulation and the impact of increasing global warming, with designs to minimise the impact on health of overheating.

Policy 8: Historic Environment

We support measures to protect the local historical environment

Policy 9: Garden Development

The supporting text of this policy could benefit from reference to preserving allotments as they are in demand across the UK and provide useful support role in preventing both physical and mental health conditions.

Policy 10: Flood Risk

This policy recognises the impact off Flooding on local communities and the implications for residents in this low-lying area of the Fenland.

Policy 11: Coalescence of Villages

This policy could potentially to help support and retain social cohesion within smaller village communities, where the lack of engagement in the local community may contribute to mental health issues such as depression. This has been highlighted during Covid, when UK residents were encouraged to work from home and minimised contact with others. The longer-term impacts of the lack of social interaction particularly in smaller communities can impact on the health and wellbeing of local residents. We would suggest making reference to this issue in this policy.

Policy 12: Delivering Sustainable Transport

The policy is informed by both the Growing Fenland masterplan and a wide-ranging previous report *Whittlesey - A market town fit for the future*.

Chapter 8. Of the *Whittlesey - A market town fit for the future report - the Transport improvement package* - includes short-, medium- and long-term measures to encourage sustainable travel:

“Improving bus and rail services, reducing the impact of heavy vehicles, that of commuters on car parking and aspiration for a relief road”. The market town report recognises that some of the proposals will require *considerable long-term investment from a range of partners.*

In terms of active travel, we would suggest that the supporting text be revised to illustrate the potential for cycling and walking in the NP area, along with possible new cycling and walking routes. The NP should also include reference to the National Cycle routes, raised in the Market towns report. For example: Route 63 travels west to east across the town and is shown on the Peterborough cycle map. Nevertheless, it is not mentioned in the NP and the partners may wish to consider this, revising the policy text accordingly.

Furthermore, the NP partners may wish to consider including additional measures within the NP designed to encourage active travel. Such as: seeking support for a dedicated cycle map encompassing the whole NP area, on similar lines to that produced by Cambridgeshire County Council for areas such as Wisbech, St Ives, St Neots. These maps show routes to schools, employment and leisure activities within reasonable cycling distance from local communities. The NP partners may also wish to include aspirations to seek improvements to cycle parking in the town and village centres. Such a measure would be welcomed by Public Health, encouraging physical activity, potentially to contributing to a reduction in high levels of obesity and many other health conditions. This is particularly significant as the Market towns report evidences *“People in Whittlesey experience somewhat worse health outcomes than the rest of the country”* and *“Healthy eating amongst adults is below national levels”*. These suggested changes would providing a link between this policy and others such as 3, 4, 5, & 6.

A further useful quote from chapter 4 of the Market towns report regards walking *“It will encourage healthier living amongst residents by giving them a safe and interesting route to explore”*. The NP partners could consider including this quote within the NP.

It may also be useful to include the following other quote from the market towns report in relation to the potential public transport market.

“83% of respondents say they would make journeys by public transport, walking and cycling if services are improved”.

Clearly the respondents have also reflected on frequency and reliability of local bus services in other areas, compared to the NP area. Particularly the limited stop services operating to other communities outside the NP, to and from Peterborough. Potentially linked to this, is the impact on bus services reliability and journey times of the local railway crossings. Reference to any available current evidence of the impact of this from bus operators would support the long-term aspiration for a bridge to replace the crossing at Kings Dyke.

In terms of the local rail service, two main issues are raised in the market towns report: reliability of the service’s, appear to be barriers to the use of rail services:

- personal safety/security issues at the station
- the relatively remote location of the station the both the town centre and the northern residential areas.

Consideration could be given to expanding both the supporting text and policy 12 to incorporate these topics.

A major concern of local residents is commercial vehicles with the NP explaining *that “ Whittlesey experiences greater proportions of HCV traffic compared with other market towns in Cambridgeshire”*. Details of the source of further evidence such as traffic count data, road safety data and

air quality data would welcome. For example: The 2021 Annual air quality Status report that includes monitoring data from within the NP area at: Kings Dyke, Cemetery Rd, Station Rd, West End and Eastrea Rd in Whittlesey and one motoring site in Coates. Such data would help provided a clearer detail of the impact of commercial vehicles on health and wellbeing of local residents.

Policy 13: Adapting to and Mitigating Climate Change

We welcome the commitment to climate change set out in policy 13. The supporting text clearly linking the various NP polices that will help meet the net zero target. It is encouraging that the climate change policies include commitment to: *“ local food production and opportunities for on-site food production, such as community orchards and allotments, as part of the scheme’s on-site recreation provision”* as such scheme have clear benefits to by physical and mental health.

Chapter 4 supporting information

We would encourage the NP partners to include reference to specific health related documents which are currently not referred to in the *Supporting information* section of the NP. Such as: Joint Strategy Needs Assessment (JSNA), the Health and Wellbeing strategy and the emerging Countywide Active Travel Strategy.

The Cambridgeshire Joint Strategic Needs Assessment (JSNA) and the accompanying theme reports includes numerous reference to the importance of the built environment on health and wellbeing, such as: *“.....well connected to green spaces and walking routes”* , *“ makes provision for... improved access to quality local services, healthy transport choices such as cycling and walking, access to our green infrastructure and active recreation”* and the *“Importance of accessible green space and parks, which need to be designed to maximise potential use”*.

Conclusion

The NP is useful document and is strongly supportive of the Fenland Local Plan. There are clearly local issues around Sustainable Transport, Climate Change and Housing Growth all of which have appropriate policies.

We however, suggest the following points to help further reinforce the role of the NP and benefit the local community:

Employment and Skills

Historically parts of the Fenland area have high levels of Long-term unemployment than the Cambridgeshire average and more part time workers than the Cambridgeshire average. It would be helpful if the NP could provide an indication of potential support for these sections of the community, as they are likely to be amongst worst effected residents in terms of rises in energy prices and other increases cost of living.

		<p>In terms of support the Market Towns report including a specific section on up skilling the workforce. It would be helpful if this could be discussed further in the support text of the polices in the NP. This would also help provide an indication of progress against previous benchmark figures. For example, in 2011 28.7% left school with no qualifications.</p> <p>Ageing population</p> <p>Finally, the area has a higher level of retired individuals than both Cambridgeshire and the national average. It would be useful if the NP could provide further support for this section of the community policies. Issues such as access to healthcare, transport and local shops for those without access to a car, could be expanded upon in the supporting text to various polices. With over 15% of the population with no access to a car this is key issue for many residents and is reinforced by the points made around poor-quality public transport. Linked to these issues is the surprisingly lack of refence to the number or level of primary care services in the area or access to hospitals.</p>
<p>P Wilson and Company Chartered Surveyors</p> <p>Sub-mitted by Edward B Gammell</p>	<p>31st August 2022</p>	<p>We have been asked to comment on the Whittlesey Draft Neighbourhood Plan 2021-2040 (the draft Plan) on behalf of our clients.</p> <p>Our clients are owners of property in Whittlesey, and support the work which has been undertaken to date in the preparation of the Neighbourhood Plan. However, they would like to take this opportunity to make further comments on the draft Plan, to support the plan making process, and further improve the draft Plan for the benefit of the town and community. We would therefore comment as follows:</p> <p><u>Growth</u></p> <p>Our clients support the aspiration stated in the draft Plan to promote growth in Whittlesey. However, it is a matter of concern that such aspirations are not supported in the draft Plan by specific targets for such as growth, particularly in respect of housing numbers, therefore making the aspiration difficult to quantify, and therefore properly implement.</p> <p>The existing and emerging draft Fenland Local Plans base their strategy for the distribution of new housing for Whittlesey on extant planning permissions, rather than looking for new opportunities for future growth. As such the figures contained in the emerging Local Plan, fall significantly short of the target of 115 dwellings per year previously identified by the Whittlesey Town Council Housing Needs Assessment. Therefore to support the stated aspiration for growth, it is considered that the Neighbourhood Plan should incorporate a formal annual growth Target for housing, based on the previous Whittlesey Town Council Housing Needs Assessment (ie, 115 dwellings per year), and thereby provide a specific and measurable trajectory for growth in the town.</p> <p><u>Spatial Strategy (Policy 1-B)</u></p> <p>Our clients support the aspiration to site new housing developments on the east side of the town, adjacent to the previous strategic allocation contained in the existing Fenland Local Plan (now Dandelion Drive).</p>

The land to the north of Eastrea Road, between Dandelion Drive and Drybread Road, whilst not currently subject to a planning application, is being promoted through the Local Plan Call for Sites. This site is considered to provide the best opportunity for the growth of the town, and to meet the target of 115 dwellings a year previously identified in the Whittlesey Town Council Housing Needs Assessment.

Coalescence of Villages (Policy 11)

Our clients note that the proposed boundaries of the Green Buffer separating Whittlesey from Eastrea includes (in the south west corner of the land north of the A605) the existing and long established farmstead at Gothic Farm. It is considered that the existing yard and buildings at Gothic Farm should be excluded from the Green Buffer to safeguard their continuing operation, and so that their future use is not inadvertently restricted by their otiose inclusion in the Green Buffer.

Without prejudice to the comments above in respect of Gothic Farm, it is considered that the proposed boundaries of the Green Buffer between Whittlesey and Eastrea are arbitrary, and potentially unnecessary, with low lying land in Flood Zone 3, located east of Drybread Road and west of Eastrea providing a natural break on any potential coalescence of Whittlesey and Eastrea. It is therefore suggested that the boundaries of any Green Buffer in this location could be less arbitrarily arranged by matching the existing boundaries of Flood Zone 3, thereby maintaining the natural break in development, without unduly prejudicing any future development of land, in Flood Zone 1, not at significant risk of flooding, particularly on the western side of Eastrea, and thereby supporting the aspiration of future growth expressed elsewhere within the Neighbourhood Plan.

Conclusion

In conclusion, our clients support the draft Neighbourhood Plan, and particularly the Spatial Strategy for the development of the land to the east of the town, which is available to meet the growth aspirations expressed. It is however considered that Neighbourhood Plan could be improved by making the following amendments:

- i. to include a clear target for the delivery of housing, to support the aspirations for growth, based on the Whittlesey Town Council's Housing Needs Assessment of 115 dwellings per annum;
- ii. exclude the yard and buildings at Gothic Farm from the Green Buffer to the north of Eastrea Road to allow its continued operation, and prevent any impediment to its future use;
- iii. acknowledge the natural break on potential development between Whittlesey and Eastrea provided by the land form, and associated flood risk, and align the proposed boundaries of the Green Buffer with those of the land in Flood Zone 3 with elevated flood risk.

We trust the above points are clear, and sufficient for consideration as part of the consultation on the Whittlesey Draft Neighbourhood Plan 2021-2040. However, if you require any further information on any of these points then please do not hesitate to contact me.

<p>Robert Doughty Consultancy</p> <p>Submitted by Michael Braithwaite on behalf of Rose Homes (EA) Limited</p> <p>See also PDF attachment Drawing No. 830-38_PL_SP 03 dated 20/11/19</p>	<p>26th August 2022</p>	<p>Thank you for the opportunity to comment on the Submission Draft Whittlesey Neighbourhood Plan.</p> <p>Our client, Rose Homes (EA) Limited, is a Whittlesey based regional housebuilder which is active in the Fenland District and wider Cambridgeshire area. Rose Homes (EA) Limited welcomes and supports the work undertaken to prepare the Neighbourhood Plan for Whittlesey. We wish to make comments on our client’s behalf to support the Plan and that might also serve to improve it.</p> <p><u>Growth Strategy</u></p> <p>We welcome the stated aspiration to promote growth in the town, suitable for its needs. We are concerned, however, at the absence of any specific and measurable targets, such as a housing growth figure, which will make the plan difficult to both implement and monitor.</p> <p>In the absence of a growth target being set by either the emerging or adopted Local Plan for Fenland District, we would suggest formalising the housing growth target, set out in the Whittlesey Town Council’s Housing Needs Assessment (HNA), of 115 dwellings per year over the plan period.</p> <p>Although the HNA was published in 2017, we note the quantum figures appear to reflect the district wide figures for Fenland District produced to support the emerging draft Local Plan. The target, as a floor for growth, can be given significant weight.</p> <p>The current and emerging draft local plans have based the strategy for the distribution of growth for Whittlesey on extant planning permissions, rather than a positive statement of aspiration for the community. As such, the growth targets fall significantly short of the target of 115 dwellings per year identified in the HNA. Neither the adopted or emerging local plans provide a context for Neighbourhood Planning for the area and this task needs to be defined by the Neighbourhood Plan process itself. The Neighbourhood Plan, by including the annual growth target, would provide a positive, and justified, framework for the future of the town.</p> <p><u>Focus for Growth</u></p> <p>We note and acknowledge the aspiration to promote growth to the east of the town, near the Strategic Allocation promoted in the Adopted Fenland Local Plan.</p> <p>The area to the south of Eastrea Road is subject to extant permissions for housing and a supermarket, and is proposed to be allocated in the emerging Local Plan. These works are now underway. Although the Country Park referred to in the draft Neighbourhood Plan was included in an earlier consent for a supermarket, the consents currently being delivered make no reference to the country park.</p>

The land to the north of Eastrea Road, between Drybread Road to the east, and the ongoing Dandelion Drive development, is not currently subject to a planning application but Rose Homes (EA) Limited has promoted this through the Local Plan Call for Sites as part of the review of the Fenland Local Plan. The site provides one of the few opportunities to deliver growth to meet the target of 115 dwellings a year over the plan period. The involvement of Rose Homes (EA) Limited will provide confidence the site will be delivered quickly, making its full contribution towards delivering the homes that Whittlesey needs, in the most appropriate, sustainable, location with access to the existing services and facilities within the town, and excellent access to the recently approved supermarket.

Green Buffer

We note and support the proposed Green Buffer shown on Map 8 of the Draft Neighbourhood Plan. The land to the north of Eastrea Road, between Drybread Road and Eastrea, will provide a long-term break between Eastrea and Whittlesey. The land to the south was included in the “Country Park”, which is approved under decision F/YR11/0930/F for a food store, petrol filling station and country park, although the later consents, currently being implemented, make no reference to the country park. The ongoing development, however, does not prejudice the openness of the buffer identified in the draft Neighbourhood Plan.

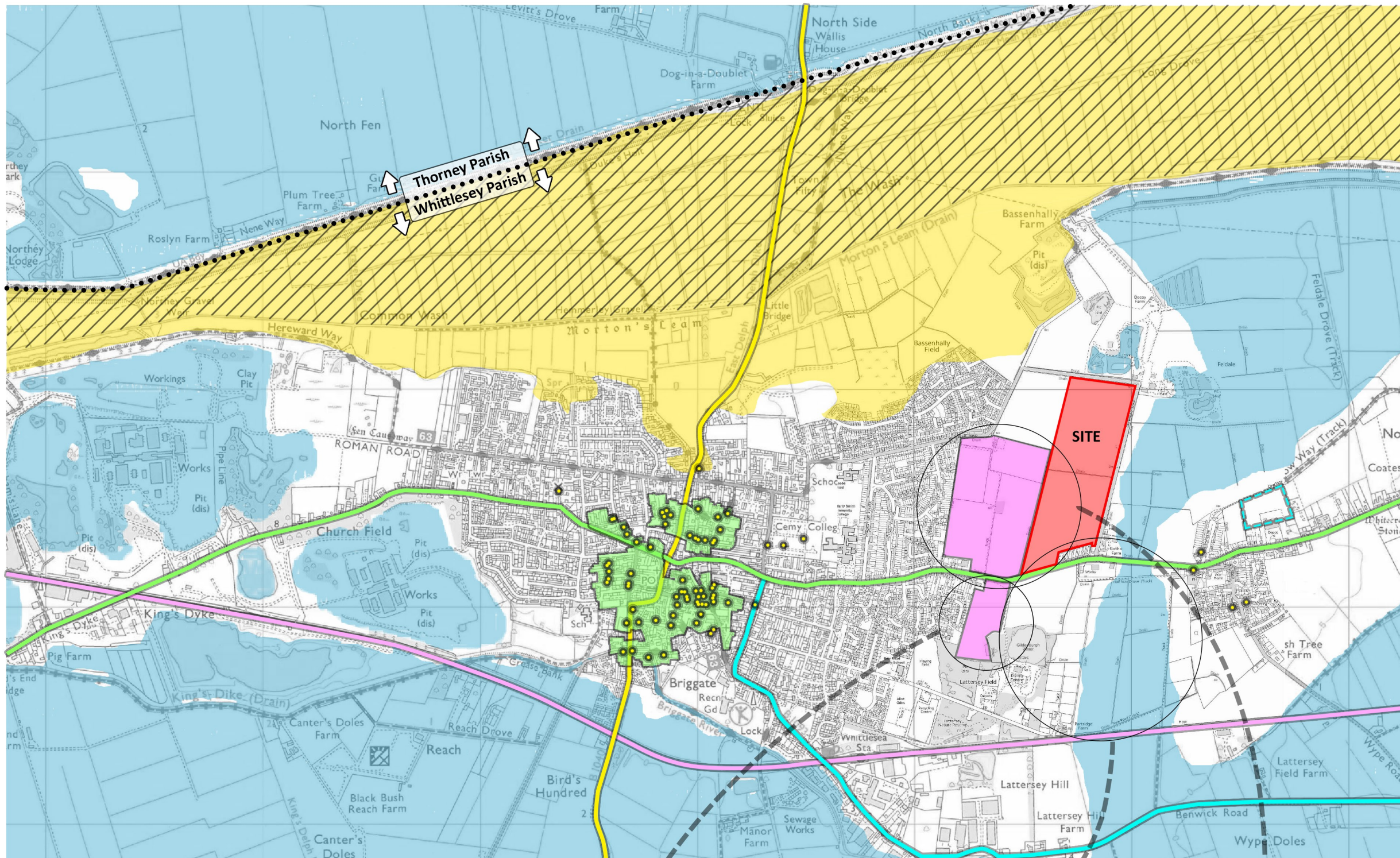
We note, however, that the southwest corner of the buffer to the north of Eastrea Road is occupied by an active farmyard (Gothic Farm). We request Gothic Farm is excluded from the buffer to ensure that it can continue to function, and its use is not inadvertently curtailed by inclusion in the buffer zone.

The buffer, including as it does, the proposed country park to the south of Eastrea Road, and agricultural land to the east of Drybread Road to the north, will, if amended to exclude Gothic Farm, provide a logical and defensible buffer between Whittlesey and Eastrea.

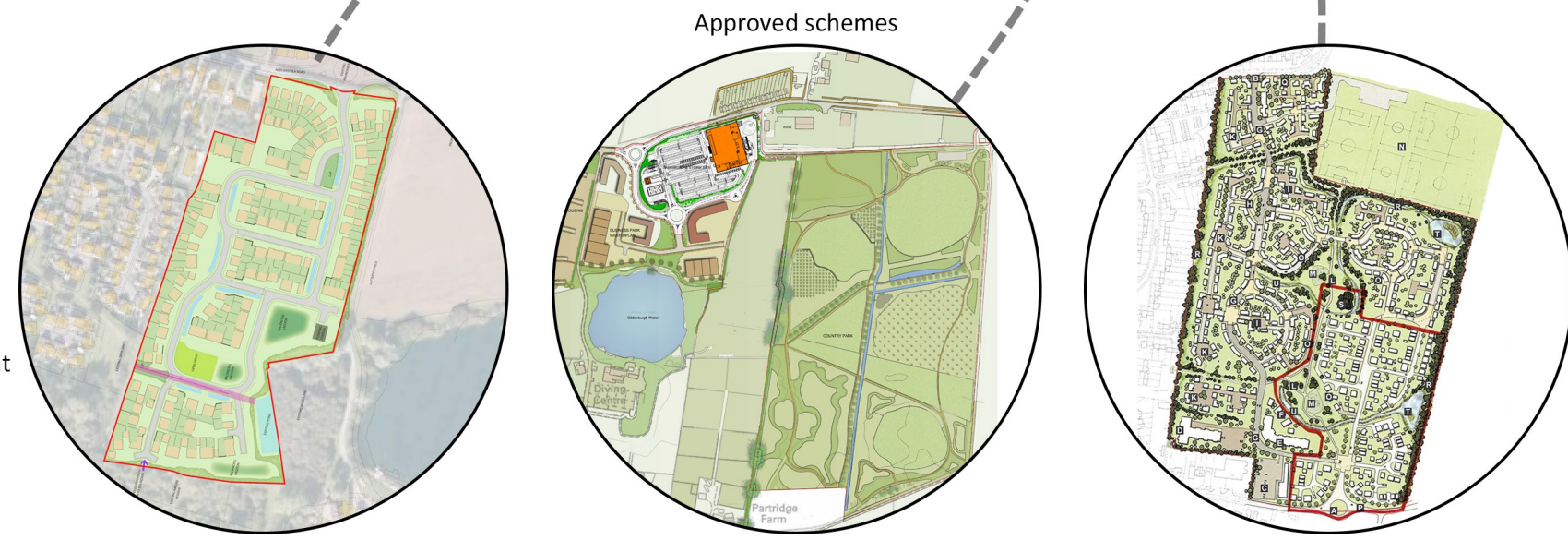
In conclusion, we support the draft Neighbourhood Plan. We can confirm that land to the east of the town, to the north of Eastrea Road, is capable of coming forward to meet the growth aspirations set out in the plan. The plan, however, could be strengthened by making the following amendments to:

- a) Set out a growth target for the plan period, based on the figure of 115 dwellings per year set out in the Housing Needs Assessment. This will provide a definite framework for monitoring the effectiveness of the plan. The land to the north of Eastrea Road is capable of helping deliver the level of new housing identified in the Housing Needs Assessment.
- b) Exclude Gothic Farm from the green buffer to the east of Drybread Road and to the north of Eastrea Road. The well-established yard is in continual operation and inclusion of the yard in the green buffer may prejudice its use.

Please do not hesitate to contact us should you require clarification on any of the points set out above.



- Parish boundary
- ////// Ramsar Site & SSSI
- Yellow box Flood Storage Area
- Blue box Flood Zone 3
- Pink box Strategic Allocations
- Green box Conservation Area
- Pink line Railway
- Yellow line B1040
- Green line A605
- Cyan line B1093
- Yellow dots Listed buildings
- Dashed blue box Scheduled monument



Notes

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Rev	Description	Date
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Client
 Rose Homes (EA) Ltd

Project
 Residential Development
 Land off Eastrea Road, Whittlesey

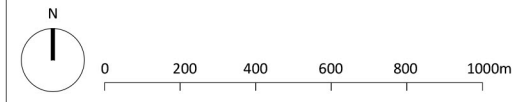
Drawing
 Designations Plan

Scale @ A3 1: 20,000	Date 20/11/19
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Job Number 830-38	Status PL	Purpose of Issue Planning
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Drawing No. 830-38_PL_SP03	Rev -
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<p>Gareth Tancred</p>	<p>1st Sept-ember 2022</p>	<p>Thank you for sharing your utopian vision for the town. It was as perfect as a childhood Jackanory story. I must admit it was hard to reconcile the vision and objectives with the current reality, but with a lot of imagination and some seismic changes, I guess anything is possible. I particularly enjoyed the DeLorean-esque time travel to 2037, only 15 years from now and 3 years from the end of your current plan. However, I thought it needed a bit more reality:</p> <p><i>“It’s the year 2037 and a visitor has arrived in Whittlesey Parish, much of the western side of which has been subsumed by growth from Peterborough. It’s their first visit to the area, although their family hails from the town – they were attracted by their family heritage and were particularly keen to see the mud walls and explore the Bronze Age settlement at Must Farm. Sadly, the mud walls that the visitor’s grandparents spoke about have long been eroded by a multiple-fold increase in HCV traffic. There’s no visitors centre at Must Farm as was promised, and even if there were, the artefacts have long since gone. The visitor found more information online than in the local museum.</i></p> <p><i>Our visitor strolls down Market Street looking at the derelict town centre. His grandparents recount the bustling variety of shops in the 1980s and 90s that over time all fell to competition from nearby retail parks around Peterborough, and then to the convenience of online shopping which has been the norm since the Covid pandemic of 2019. The visitor however does need a haircut and come to think of it, is hungry, so samples a kebab and grabs a quick trim from one of the multiple outlets of those kind in the town. He notices there aren’t many people in town and the barber tells him that people don’t shop here anymore for all the reasons mentioned earlier. On leaving the barber and rounding the corner they encounter a market with unique local produce – unique in the sense that despite the local soil being among the best in the country, it’s so polluted due to growth of waste industries in Saxon Pit, nobody wants to buy it.</i></p> <p><i>The stallholder has lived in the area all his life, as have several generations of his family. He’s seen the area change over the years; new people have moved into the community, attracted by cheap housing, in fact since the collapse of local house prices in 2022/3 following the development of Saxon Pit as a waste processing facility, even homes once classed as Executive can be picked up for the price of a two-bedroomed semi in Peterborough. He asks about local transport and is told there’s a railway station on the eastern edge of the town that’s of no value as the trains are so infrequent and overpriced and at least 40 minutes walking distance from the western side of the town. He’s also told about the bus service which does have a few pick-up stops in the town, but then goes all round the houses of Stanground. They lament the 24 stops between Roman Close and Queensgate Bus Station and the fact it’s not operational after certain hours. They ask about local services. Alas, despite the thousands of new homes built and the local population explosion, no new schools have been built in decades. There is no longer a dentist in the town, and their grandmother says she gave up trying to make an appointment at the Doctors’ surgery in 2019. She commented that young people move away to find jobs because the local area only seem to encourage firms providing low-paid blue-collar work in Saxon Pit.”</i></p> <p>However, on a more serious note, please allow me to comment on your objectives and policies.</p> <p>Objectives</p> <p>2.2.3 – You mention an objective to “promote high quality economic & employment opportunities in appropriate locations.” The recent endeavour in Saxon Pit granted planning permission in 2022 by Cambridgeshire County Council, following a multi-million pound investment ‘at their own risk’,</p>
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has, in the words of their own Chief Executive, trouble finding staff because 30% given employment fail a drugs test. It is disappointing to note that employers are recruiting and employing people with a serious drugs problem, so close to a residential area and school. The Council is hardly promoting “high quality economic and employment opportunities” by supporting operations such as this.

2.2.5 – In this policy, you “seek ongoing improvements to transport, specifically East-West connectivity.” Whittlesey became a laughingstock in the media being the only town with a bypass through the centre of town. A Southern ring road, whilst helping solve some of the HGV problem through the town centre, won’t solve the tens of thousands of HGV’s going through Kings Delph, Kings Dyke and into Saxon Pit (occasionally having to come through the town centre when the A605 has roadworks). Ironically, whilst I support a Southern ring-road, please note that ring roads generally take traffic away from town centres, which contradicts Objective 2.2.4 (improving the shopping experience)

2.2.6 – You state you will “seek ongoing improvement to flood defences, utility infrastructure & digital connectivity.” However, in stark contradiction to this, you have:

- Allowed the building of new estates off the flood areas adjacent to Stonald Road and the Showground. Granted, the Glenfields North estate is built on a higher elevation to mitigate against flooding risk. However, surface water runs off that estate into neighbouring Snowley Park and Glenfields, flooding gardens – the very thing you’re trying to prevent.
- Not ensured that local builders also develop ‘D’ category community projects, such as Doctors’ Surgeries, Dentists, schools, etc.
- Not worked with BT Openworld or other internet infrastructure providers to bring fibre connectivity to the area. BT have no plans to upgrade infrastructure until 2026 at the earliest. Virgin Media haven’t even cabled whole town. City Fibre have no plans for the area. For areas of the town with no access to Virgin Media, the fastest speed available is 35Mb.

2.2.8 – Perhaps the most difficult objective to comprehend is to “Promote health & well-being [sic] of residents and visitors, creating a place which supports a high quality of life.” This is quite possibly the most hypocritical statement in the Plan. How can Councillors accept the development of Saxon Pit as a giant waste processing facility with residents’ concerns over unacceptable noise, dust, pollution, complaints about sore throats and the health risk from Incinerator Bottom Ash? Councillors appear to ‘turn a blind eye’ to the goings on in the pit despite the protestations of a large number of residents and the close proximity to a substantial residential area and a primary school!

Policies

3.2.3 – “The neighbourhood plan supports providing a range of house types – including starter homes, family homes, executive homes, self-build homes and affordable tenures” – where are the self-build plots? Why put social housing in with executive homes?

3.2e – “Development proposals that include dwellings designed explicitly for a wheelchair user to live in will be supported. Such proposals should conform to Building Regs Part M4(3)” – the Council should ensure builders construct property that conforms to the fullest extent rather than pay lip service to this provision. Most builders build a ramp to the front door and put light switches and sockets at a better height for wheelchair users. There is often:

- no shower downstairs and where there is, there's no room to get a wheelchair into it
- no downstairs bedroom
- no ramp at the rear of the property

3.2f – “Meeting wider needs”. You state that development proposals which make provision for selfbuild and executive homes will be supported. Many builders providing this, still allocate it within an estate setting. The reason people want these is to get away from estates! What provision will there be for land set aside for these types of development?

3.3.2 – This policy speaks about retaining trade and attracting traders to the town centre. You argue that this would benefit local economy, reduce travel to other locations and reduce emissions. Firstly, there is a litany of shop closures even before Covid-19. Several years ago there were two DIY stores – Ostlers and Costmill. As grateful as I was to have two in the town, I would regularly make the journey to the larger stores Peterborough in the knowledge that they are more likely to have what I need. This is also true of other retail outlets. Whittlesey has an Island economy. Consider fuel prices – people will travel to Applegreen in Stanground, Morrisons in Cardea, or the filling station in Padholme Road East – all significantly cheaper than petrol stations in Whittlesey. Shoppers travel to large supermarkets or low-cost supermarkets as the Co-op has a monopoly and prices accordingly. It is a fact that smaller shops cannot compete with the economies of scale the larger retailers have. The town centre was in decline long before Covid with the rise of Peterborough's many retail parks. This has been exacerbated with the supremacy of online shopping where the consumer doesn't need to leave home for anything from groceries to hardware, and more.

3.5 Local green space – this is woefully lacking, and existing spaces are not adequately maintained. The grass is cut less and less frequently and litter is collected by volunteers.

3.5a Glenfields is missing

3.6 Country park – When one looks at the transformation of Nene Park, Orton Mere, Crown Lakes, etc., the contrast with Saxon Pit is stark. The former are areas of beauty, environmental conservation, climate-supporting, and pleasant for families to visit. The juxtaposition of a nature reserve across the road from the pollution-encouraging Saxon Pit is astonishing. Surely Saxon Pit would have been ideal for development into such an area as mentioned before, rather than the brownfield site proposed. Yes, the site is currently owned. It's also massively polluted with 122000 tonnes of non-conforming waste. The Council should work with the Environment Agency and others to acquire the land, restore it and develop it for the benefit of the community and environment.

3.6.3 – see above 3.6

3.12.3 The transport strategy figures are out of date following the recent permissions granted in Saxon Pit. There will now be tens of thousands of extra HCVs (see 2.2.5).

	<p>3.12.10 Provision of public transport should include wheelchair access on buses and the ability at access both sides of the railway station platforms (when the gates are closed). The park & ride scheme to Peterborough is counter intuitive to retail growth locally. The Plan has a lot of emphasis on carbon-reduction, pollution control and protecting the environment which is hypocritical based on the permits granted to companies and the HCV movements required to run their operations in Saxon Pit.</p> <p>3.13 Adapting to and Mitigating Climate Change.</p> <p>You note that “Whittlesey Neighbourhood Area is especially vulnerable” (3.13.3) and that the “Neighbourhood Plan has both a moral & legal responsibility to support a reduction in carbon emissions and address climate change (3.13.5). It is astonishing that there is no reference to:</p> <ul style="list-style-type: none"> • air quality as mentioned in the Environment Act 1995 s82, which requires every local authority to review the air quality within its area, both at the present time and the likely future air quality. It is unbelievable that the local and district councils do not measure particulate levels down to 2.5 microns. Even more unbelievable is the consent given to operators in Saxon Pit whose production outputs are generally known to cause particulate pollution. The Council does not measure as it does not have the equipment to do so and has only relented following pressure from a local residents’ group. Even more shocking is the location on the edge of a large housing estate and a few hundred metres from the Park Lane Nursery and Primary School. What plans are there to commission such monitoring and to take enforcement action if, and when necessary? • dust/odour as mentioned in the Environmental Protection Act 1990 s79. Again, as above, there is no local monitoring despite the permits given to operators in Saxon Pit whose processes are known to cause dust and odours. <p>The local council continues to turn a blind eye to proposals to further develop Saxon Pit despite the Environment Agency’s criminal investigation into the alleged dumping of 122k tonnes non-permitted waste. Here’s a radical idea – ban further development of Saxon Pit and limit the number of HCVs that operators can bring into the area – create an emissions zone similar to London. Levy a charge on all HCVs.</p> <p>So, in conclusion, let me return to the vision as re-written. This amended vision is the likely reality based on current and historic trends. Not a great future, is it? My question therefore is, what are you going to do about it? This Plan as it stands has many gaping holes.</p>
<p>The Coal Authority Sub- mitted by Deb Roberts</p>	<p>Thank you for your notification below regarding the draft Whittlesey Neighbourhood Plan Consultation.</p> <p>The Coal Authority is only a statutory consultee for coalfield Local Authorities. As you are aware, Fenland District Council lies outside the coalfield, therefore there is no requirement for you to consult us and / or notify us of any emerging neighbourhood plans.</p> <p>This email can be used as evidence for the legal and procedural consultation requirements at examination, if necessary.</p>

Amy White	28 th July 2022	<p>In relation to the neighbourhood plan vision 2.2.8 (“Promote the health and well-being of residents and visitors, creating a place which supports a high quality of life.”), I have a proposal I wish to be considered within this plans review.</p> <p>Within the village of Turves, we do not have many local amenities, but of those we do (pub, village park/green, and bus stop for the college bus) half of the community are cut off from a safe passage to them due to lack of public paving. Currently there are three sections of the Turves roads that aren’t supported by a public footpath, all of these are 40mph and frequently drivers exceed this speed. This is on the blind corner of Whittlesey/march road (and along Whittlesey road to the railway crossing in the march direction) as well as a section down march road between house number 400, and the Three Horseshoes pub, which also has a sharp blind bend leading towards farm land and the larger housing estate. Finally a small section between the Three Horseshoes pub and the other side of the railway down Burnthouse road. All of these sections commonly see dog walkers and family (walking toddlers and prams) being confronted with cars, lorries and agricultural vehicles where safety is of concern. Recently we were out with my sister walking our 9 week old daughter and she pushed the pram into the overgrown verge because she didn’t feel safe with the oncoming traffic. It’s a real concern that this lack of pedestrian paving could lead to a devastating fatality, which is all preventable by the basic provision of a safe pedestrian pavement.</p> <p>“The block” that consists of Quakers drove, Burnt House Road, March Road and the public footpath that joins back to Quakers drove is a popular walking route for the community but I understand that to extend beyond the main village to cover Quakers drove is probably not feasible. However, a safe connection to the local facilities for the bulk of the village should be considered, otherwise there is limited safe options for family/dog walks and trips to the play park/pub. Otherwise you end with people driving to get to a park or needing to get a 200m taxi drive after spending the evening at the local which would go against the policies 2.2.7, and 3.13.</p> <p>I hope you can understand why we believe that this should be a consideration due to the safety, environmental and quality of life impacts it has.</p>
Anthony White	27 th July 2022	<p>I hope this email finds you well.</p> <p>Upon reading the proposed neighbourhood plan, I see a key area I’d like review is connectivity in local villages.</p> <p>With the ever increasing size of Whittlesey, and the congestion/emissions impact of this, there seems to be a lack of focus on the smaller villages. Currently in Turves there is no means of public transport and the bike route isn’t really safe. For example, in and out of the village is only 60mph roads, only one of which is really built to allow 2 car widths.</p> <p>The narrowness of the roads (along with considerable subsidence) also mean that they are not really fit for a bus route. Only the school and college buses stop, and have difficult turning circles to manoeuvre. This can leave villages with not option but to drive, or get an expensive taxi ad they need to come so far out of the way for collection. This is not environmentally friendly nor enabling for the ageing population.</p>

		<p>In the village we have plenty of land around the railway crossing that intersects with the village roads 4 times. My proposal would be that a “budget” train station is built where there trains only stop when a ticket has been booked on. Longer term it would be nice to have the old railway building restored and brought into this as it is sad to see the rundown landmark in the village.</p> <p>This proposal would support policies 3.12.11 for a sustainable transport network and would elevate the road infrastructure. This is further supported by level crossing policy 3.12.6 and improving the environmental impact of the community that is within the flood risk zone in policy 3.13.3. I believe this is the most cost effective and sustainable method to introduce public transport to the community and not alienate the elderly, ill or pregnant members that may not be able to drive or afford a taxi with the ever increasing cost of living.</p> <p>I hope you will consider this proposal and I am happy to contribute further to the discussion if required.</p>
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