
F/YR23/0500/F

Applicant: Construct Reason Ltd

**Agent : Miss Amy Richardson
Ashtons Legal**

North Of, 43 - 53 High Street, Doddington, Cambridgeshire

Erect 14 x dwellings (2 x single-storey, 2-bed and 12 x single-storey, 3-bed) with associated garages, parking and landscaping, involving demolition of existing outbuildings

Officer recommendation: REFUSE

Reason for Committee: Number of representations contrary to Officer recommendation.

1 EXECUTIVE SUMMARY

- 1.1 The proposal for residential development of 16no dwellings, F/YR21/0065/F was withdrawn in May 2021 following an objection from the Council's Conservation Officer.
- 1.2 A further scheme for 16no bungalows, F/YR21/1386/F was refused under delegated powers in 2021. There were four reasons for refusal. Firstly, the adverse impact upon the character of the area and its impact upon the nearby Grade II Listed mill. Secondly, the loss of biodiversity units on site with insufficient evidence to demonstrate that off-site contributions were adequate to mitigate for the loss; thirdly the impact upon residential amenity along The Larches with the fourth reason relating to the failure to submit a Section 106 agreement to secure financial and infrastructure contributions.
- 1.3 This application seeks full planning permission for the erection of 14no bungalows which sees an amended site layout removing two dwellings in close proximity to Nos 8 & 9 The Larches.
- 1.4 The application has also been supplemented with additional Biodiversity information; a Viability Assessment and a revised Heritage Statement.
- 1.5 Upon review, the Council's independent assessor has concluded that the site is viable, and the agent has agreed to Heads of Terms, specified in the report, therefore, should the application have been recommended for approval, this would have been subject to a Section 106 agreement.
- 1.6 The scheme submitted is for 14no dwellings, reduced from the previously refused 16no, all comprising single-storey bungalows. It has been concluded that due to the reduction and the reorientation of one of the plots, these are mitigating factors in ensuring neighbouring amenity will not be adversely affected. This is further discussed in the report.
- 1.7 Further Ecology information has been received during the course of the application and the Council's ecologist has removed their original objection, subject to the imposition of numerous conditions.
- 1.8 The Council's Conservation Officer maintains their objection. Given the level of detrimental impact on the setting of the Grade II Listed mill and the character and appearance of the conservation area, this development is not supported in principle and fails to comply with Local Plan Policy LP18 and paragraphs 193, 94 & 196 of the NPPF. This is discussed in detail within the Heritage Assets section of the report.

1.9 The application is therefore recommended for refusal.

2 SITE DESCRIPTION

- 2.1 The site comprises an area of land, approximately 1.064 hectares, described as a 'paddock' within the Design and Access Statement, however, within the application form states the previous use of the land as 'not known'.
- 2.2 The area of land is situated to the rear of properties located on the High Street and to the west of Sutton Way and The Larches which comprises residential development. To the north of the site is the recently built residential development of Juniper Close, from which it is proposed to access this site. Juniper Close comprises detached bungalows and was constructed by the same developer who seeks planning permission for this proposal.
- 2.3 The western boundary of the site borders agricultural land to the northwest and the curtilage of The Mill House which is served by a long driveway leading off High Street. The Grade II Listed Doddington Windmill is situated to the northeast corner of the curtilage of The Mill House and is adjacent to the proposed site. The southern site boundary borders Doddington Conservation Area. There are drains along the west boundary which are maintained by the local drainage board. The site lies in Flood Zone 1 which is the area at least risk of flooding.

3 PROPOSAL

- 3.1 The application is for full planning permission and proposes the construction of 14 bungalows comprising 2no. 2-bedrooms and 12no 3-bedrooms accessed off a central road which would extend southwards from Juniper Close. It is proposed to construct the road to an adoptable standard.
- 3.2 The bungalows are a mixture of design types but are quite similar in appearance. Each would have either a double or single garage and driveway parking. A water attenuation basin is proposed to be located to the northwest of the site to provide attenuation for surface water before it is drained into the ditches bordering the site and a proposed pond to the east of the road, partway down the site.
- 3.3 The external finishes vary between the design types which are pepper potted throughout the development with Anglian Orange Stock and Anglian Cream Handmade bricks being the overriding commonality, with some properties displaying small elements of plank cladding. Roofing materials include Sandtoft Rustic Red concrete tiles and Sandtoft concrete slates with terracotta ridge tiles.
- 3.3 The application is accompanied by an Ecology Report; Landscaping Scheme; Revised Heritage Statement; Flood Risk Assessment; Arboricultural report; Viability Assessment and Biodiversity Net Gain reports.
- 3.3 All of the dwellings would be market properties. The submitted viability appraisal concludes that the site is not viable for development on the basis of the provision of affordable housing and S106 payments at full policy level or indeed any level on the basis of this assessment.
- 3.4 All of the dwellings would be fully compliant with the Nationally Described Space Standards and would be built to the accessible and adaptable standard in Part M4(2) of the Building Regulations.

4 SITE PLANNING HISTORY

F/YR21/1386 – Erect 16 x dwellings (4 x single storey, 2-bed and 12 single storey 3-bed) – Refused 25.10.22

F/YR21/0065/F – 16 bungalows – Withdrawn 10.05.2021

F/90/0015/O – 17 dwellings – Refused 12.09.1990 and subsequently dismissed on appeal

5 CONSULTATIONS

5.1 Doddington Parish Council (14/07/2023)

The Parish Council wishes to record its strongest possible objection to the above planning application. An overview of our objections covers the following issues:

- A previous application to develop this area of land under reference F/YR21/1386/F was refused by Fenland DC and whilst the current application for 14 dwellings is slightly lower than the previous application of 16 dwellings, the principal reasons for refusal are valid to the current application which appears to have been submitted with little regard to solving the issues raised at that time.*
- Any development on this site which abuts the Village Conservation Area and has proximity to the Windmill, which is a Grade 11 listed building, will result in the loss of an open meadow from the centre of the village. The development will have a serious impact on the setting to this area of the village.*
- Construction work, including possible pile driving, is likely to cause serious damage to the windmill. When the Juniper Close development took place damage did occur to the windmill as vibrations caused window panes to fall out. This was taking place when the distance from the construction site to the windmill was considerably further away than will occur with any development from the proposed application. It should also be noted that as the water attenuation basin is to be constructed in close proximity to the windmill that the deep excavations needed to undertake this construction may very well undermine the foundations of the windmill.*
- The description of the proposed development location as being "North of 43-53 High Street" is misleading as it implies that access to the High Street is possible from the site whilst in practice one would need to travel up Juniper Close and down Wood Street, a distance of approximately 1000 meters to reach the High Street.*
- The site is subject to localised flooding and is generally a very damp area.*
- The Biodiversity Net Gain Report prepared by Philip Parker Associates shows that this development will result in a net loss of species enjoying this site and to overcome this disparity, the developers have offered to pay the sum of £21,000 to the Lattersley Nature Reserve in Whittlesey. Doddington therefore not only loses an area used by numerous species but no attempt has been made to compensate the village for this loss.*
- As Doddington is shown to have a housing land supply over over 6 years, which is in excess of the Governments 5 year calculation, there is no need to approve the proposed planning application. In fact, the village housing threshold has already been extended as there are 196 units committed against the requirement of 127 units.*

As a final comment I would add that should Fenland DC chose to grant planning permission that specific conditions are added to the agreement notice:

- a) that the construction of the water attenuation basin is takes place before any work starts on building any of the proposed dwellings*
- b) that any section 106 monies are to be earmarked for projects within Doddington*

CCC Highways (06/07/2023)

- 5.2 *On the basis of the information submitted, the Local Highway Authority has no objections in principle, however, in order to make an informed decision in respect of the following*

information is required: The applicant should be invited to provide vehicle track movements to demonstrate the free passage of large vehicles through the bend adjacent to plot 14. I note that the road layout is essentially the same as that considered previously with respect to application F/YR21/1386/F and that vehicle movements were presented as part of that application. While the plans provided previously demonstrating turning at the southern extent, it was difficult to follow the opposing traffic movements through the bend. The applicant should be invited to clearly demonstrate that a vehicle such as the standard refuse freighter used for collection by Fenland District Council may pass a moderately sized family car through the bend. The plans should be comprehensively dimensioned including junction radii and vehicular/pedestrian visibility splays, including that required at the junction on the southern turning head. Should the applicant wish for the internal highway to be offered for adoption as is apparent from the application form, they will need to enter into a Section 38 Agreement with Cambridgeshire County Council. A Section 38 Agreement falls under the Highways Act 1980 and is separate to the planning process.

For Cambridgeshire County Council to consider adoption of new highway, the proposals would need to accord with the Highway Authorities 'General Principles of Development and to be constructed to the standards set out in their Housing Estate Road Construction Specification (HERCS) (current version January 2023), both of which are available online on Cambridgeshire County Councils web site. The following points are made with respect to the applicant providing highways to an adoptable standard that may otherwise be compromised by the current design:

- The Highway Authority does not adopt SuDS features (with the exception of soakaways in exceptional circumstances) nor any road drained to them unless the SuDS feature or the intervening pipework is adopted by a suitable Drainage Authority such as Anglian Water. Adoption by a private management company would not be considered sufficient in this regard.
- In Section 6.8 of the Flood Risk Assessment & Sustainable Drainage Strategy it is indicated that the retention basin shown adjacent to plots 1 to 3 will be used for absorption and attenuation. It is a requirement of Building Regulations 2010 – Part H3 Soakaways and other infiltration drainage systems - 3.25a that infiltration devices should not be built within 5m of a building or road or in areas of unstable land, or within 10m when used in areas of chalk.
- In point 5.6.9 of the Flood Risk Assessment & Sustainable Drainage Strategy, it is noted that permeable paving will be used on all private access and parking areas. The applicant should be advised that such surfaces are not considered sufficient in isolation to prevent the run-off of surface water onto the public highway; additional measures would be required such provision of surface gradients that draining away from the highway or additional drainage systems to intercept any potential run-off.
- The road should be designed with a self-enforcing 20mph speed limit which would be required to be supported a Speed Limit Order at the point of adoption.
- The footways should be 2m wide.
- Junction Radii should be 6m.
- The positioning of gullies shown on plans 1884-38 Rev D and 1884-39 Rev C in the Flood Risk Assessment & Sustainable Drainage Strategy do not appear to comply with the requirement of HERCS as follows:

- The area of road outside plot 10 appears undrained.
- The drained areas appear to exceed capacity of individual gullies. o The use of double gullies is not permitted to compensate for excessive drained areas. Where double gullies may be permitted (such as at the bottom of sag curves) they would require separate lateral connections.
- Gully lateral connections must join the main drain in the direction of flow (see gully outside plot 4).
- details of how water from private surfaces will be prevented from draining to the public highway would be required.

- Where trees are proposed within 5m of the prospective public highway as shown on plan P2021 - 52 D3, root barriers must be provided as required in section 20.03.7 of HERCS

CCC Highways (27/10/2023) Further comments following submission of additional information

While I have reservations regarding the suitability of the proposals with respect to the adoption of the roads, I have no objections to this application. I would however recommend that the drainage details shown on drawing 1884-38 Rev E and 1884-39 Rev D be considered purely indicative with respect to drainage of the road. Should these be included as an approved drawing it may conflict with the requirements of the Highway Authority and compromise adoption of the roads as part of a s38 agreement.

I note that the current proposals shows drainage from this site onto the adjacent site to the north. It is an offence to discharge private water onto the highway and should this proposed development not ultimately be adopted it may compromise adoption of the existing development. I would therefore strongly recommend that drainage from this site be managed independently from the existing development. The drainage plans have not detailed the drainage of private surfaces such as parking areas and shared driveways as may be required to prevent water entering adoptable roads as requested in my previous correspondence of 6th July 2023. This could be achieved by providing gradients that drain surfaces away from the road rather than require any positive systems and I would not therefore look to object in this regard. I would however reiterate that should appropriate measures not be provided it would make the road and associated footway unadoptable. The applicant should again be reminded that use of permeable surfaces is not considered sufficient to resolve this issue.

While not apparent on more recent images, Aerial imagery from 2016 suggests that the road entering the site crosses a ditch at the boundary with the adjacent site. The LFFA should be consulted in this regard and an appropriate condition included in any permission granted requiring submission appropriate details of the ditch crossing. The vehicular swept paths provided show vehicles passing particularly close to one another through the bend. While the track speed is not indicated, the low speeds anticipated combined with the limited vehicle movements along the proposed cul-de-sac, it is reasonable to anticipate that drivers would be able to avoid conflict with the very infrequent movement of large vehicles; I do not therefore object in this regard.

While junction visibility splays are shown on site these are not dimensioned. From scaling these appear to be broadly suitable for a 20mph speed limit road. I would note that the driveway to plot 11 has not been afforded a pedestrian visibility splay and would recommend that this be provided, as this may otherwise compromise adoption of this road.

No additional information has been provided regarding the proximity of the proposed infiltration basin to the road nor its adoption and my previous observations dated 6th July 2023 regarding this issue therefore remain applicable. The adoption of proposed highway will be subject to a Section 38 Agreement of the Highway Act 1980 and comments made within this response are done so on a without prejudice basis to any such agreement taking place.

In the interest of avoiding any abortive construction works, I strongly advised that should the applicant be granted planning approval, no construction works take place for proposed adoptable highway prior to the applicant entering into a Section 38 Agreement with the Local Highway Authority. Should the Local Planning Authority look to determine this application prior to resolution of the issues that will likely effect adoption of the roads, then I would recommend that the following conditions and informative be appended to any permission granted.

Adoptable Standards:

The highway shall be built to adoptable standards as defined by Cambridgeshire County Council Housing Estate Road Construction Specification (current at time of commencement of build) before the last dwelling is occupied. Reason: In the interests of highway safety and to ensure compliance with Policies LP15 and LP16 of the Fenland Local Plan, adopted May 2014. Binder Course: Prior to the first occupation of any dwelling the road and, footways required to access that dwelling shall be constructed to at least

binder course surfacing level from the dwelling to the adjoining County road in accordance with the details approved on 1884-48 Rev A.

Reason: In the interests of highway safety and to ensure compliance with Policies LP15 and LP16 of the Fenland Local Plan, adopted May 2014.

Construction Facilities:

Prior to the commencement of the development hereby approved adequate temporary facilities area (details of which shall have previously been submitted to and agreed in writing with the Local Planning Authority) shall be provided clear of the public highway for the parking, turning, loading and unloading of all vehicles visiting the site during the period of construction.

Reason: To minimise interference with the free flow and safety of traffic on the adjoining public highway in accordance with Policy LP15 of the Fenland Local Plan 2014.

Ditch/Watercourse Crossing:

Prior to the commencement of the development hereby approved, a scheme for construction of the vehicular and pedestrian crossing of the ditch along the frontage of the site shall be submitted to and agreed in writing by the Local Planning Authority. The development shall then be carried out in accordance with the approved details.

Reason: To ensure construction of a satisfactory access and protection of any important ecological features in the watercourse in accordance with the National Planning Policy Framework and Policies LP15 and LP19 of the Fenland Local Plan 2014.

Highway Drainage:

The approved access and all hardstanding within the site shall be constructed with adequate drainage measures to prevent surface water run-off onto the adjacent public highway and retained in perpetuity.

Reason: To prevent surface water discharging to the highway in accordance with policy LP15 of the Fenland Local Plan, adopted May 2014

Parking/Turning Area: *Prior to the first occupation of the development the proposed on-site parking/turning area shall be laid out in accordance with the approved plans, surfaced in a bound material and drained within the site. The parking/turning area, surfacing and drainage shall thereafter be retained as such in perpetuity (notwithstanding the provisions of Schedule 2, Part 1, Class F of The Town and Country Planning (General Permitted Development) (England) Order 2015, or any instrument revoking or re-enacting that Order).*

Vehicular Visibility Splays:

Prior to first occupation of the development hereby approved, visibility splays shall be provided on both sides of the new shared vehicular access and shall be maintained free from any obstruction over a height of 600 mm within an area of 2.4 metres x 25 metres measured along respectively the centre of the driveway and the edge of the carriageway.

Reason: In the interests of highway safety in accordance with Policy LP15 of the Fenland Local Plan 2014.

Pedestrian Visibility Splays:

Prior to first occupation of the development hereby approved, visibility splays shall be provided on both sides of the new vehicular access and shall be maintained free from any obstruction over a height of 600 mm within an area of 2 metres x 2m metres measured along respectively each edge of the driveway and the back of the footway.

Reason: In the interests of highway safety in accordance with Policy LP15 of the Fenland Local Plan 2014.

Management of Estate Roads:

Prior to the occupation of the first dwelling/use hereby approved, full details of the proposed arrangements for future management and maintenance of the proposed streets within the development shall be submitted to and approved in writing by the Local Planning Authority. The streets shall thereafter be maintained in accordance with the approved management and maintenance details until such time as an Agreement has been entered into unto Section 38 of the Highways Act 1980 or a Private Management and Maintenance Company has been established.

Reason: To ensure satisfactory development of the site and to ensure estate roads are managed and maintained thereafter to a suitable and safe standard, in accordance with policy LP15 of the Fenland Local Plan, adopted May 2014.

FDC Environmental Services (06/07/2023)

- 5.3 *In broad principal we have no objection to this development however the following points regarding access would need addressing:*
- *A swept path plan would be required to demonstrate that a refuse vehicle could access throughout the site turn and leave the site in a forward direction on the public highway (vehicle dimensions on the attached).*
 - *Properties served by shared private driveways will require shared collection points where the drives/roads meet the public highway (this is in place for plots 2 & 3 but not 8 & 9). Shared collection points need to be of sufficient size to accommodate up to 2 x 240 bins from each property. Residents should not be expected move bins more than 30m, Collection points should be no more than 10m from highway.*
 - *New residents will require notification of collection and storage details by the developer before moving in and the first collection takes place. - Refuse and recycling bins will be required to be provided as an integral part of the development.*

CCC Lead Local Flood Authority (05/07/2023)

- 5.4 *At present we object to the grant of planning permission for the following reasons:*
1. *Climate Change Allowances in 3.3% AEP The applicant has provided hydraulic modelling of the system in the 1% AEP with 40% climate change allowances, however it is also necessary to demonstrate the performance of the system with climate change allowances in the 3.3% AEP. In this case it is 35% as the site is located within the Old Bedford and Middle Level Management Catchment.*
 2. *Hydrobrake Diameter The hydrobrake flow control is stated to be 70mm in diameter, whilst this is adequate for a protected system the hydrobrake in question accepts flows from an open basin which increases the risk of blockage. The diameter of the hydrobrake needs to be increased to 75mm.*

Informatives Pollution Control Surface water and groundwater bodies are highly vulnerable to pollution and the impact of construction activities. It is essential that the risk of pollution (particularly during the construction phase) is considered and mitigated appropriately. It is important to remember that flow within the watercourse is likely to vary by season and it could be dry at certain times throughout the year. Dry watercourses should not be overlooked as these watercourses may flow or even flood following heavy rainfall.

CCC Lead Local Flood Authority (12/10/23) Further comments following submission of additional information

We have reviewed the following documents:

- *Drainage Plan (1 of 2), MTC Engineering, Ref: 1884-38, Rev: E, Dated: 9/8/23*
- *Drainage Plan (2 of 2), MTC Engineering, Ref: 1884-39, Rev: D, Dated: 9/8/23*
- *Flood Risk Assessment, MTC Engineering, Ref: 1884, Rev: P2, Dated: April 2023*
- *(Updated) Storm Sewer Calcs, MTC Engineering, Ref: 1884, Rev: P2, Dated: 10th July 2023*

*Based on these, as Lead Local Flood Authority (LLFA) we **can now remove our objection in principle** to the proposed development.*

The above documents demonstrate that surface water from the proposed development can be managed through the use of permeable block paving and attenuation basin, restricting surface water discharge to 2.5l/s via flow control device. The LLFA is supportive of the use

of permeable paving as in addition to controlling the rate of surface water leaving the site it also provides water quality treatment.

Water quality has been adequately addressed when assessed against the Simple Index Approach outlined in the CIRIA SuDS Manual.

We request the following conditions are imposed:

Condition 1

No laying of services, creation of hard surfaces or erection of a building shall commence until a detailed design of the surface water drainage of the site has been submitted to and approved in writing by the Local Planning Authority. Those elements of the surface water drainage system not adopted by a statutory undertaker shall thereafter be maintained and managed in accordance with the approved management and maintenance plan.

The scheme shall be based upon the principles within the agreed Flood Risk Assessment, MTC Engineering, Ref: 1884, Rev: P2, Dated: April 2023 and shall also include:

- a) Full calculations detailing the existing surface water runoff rates for the QBAR, 3.3% Annual Exceedance Probability (AEP) (1 in 30) and 1% AEP (1 in 100) storm events;*
- b) Full results of the proposed drainage system modelling in the above-referenced storm events (as well as 1% AEP plus climate change), inclusive of all collection, conveyance, storage, flow control and disposal elements and including an allowance for urban creep, together with an assessment of system performance;*
- c) Detailed drawings of the entire proposed surface water drainage system, attenuation and flow control measures, including levels, gradients, dimensions and pipe reference numbers, designed to accord with the CIRIA C753 SuDS Manual (or any equivalent guidance that may supersede or replace it);*
- d) Full detail on SuDS proposals (including location, type, size, depths, side slopes and cross sections);*
- e) Site Investigation and test results to confirm infiltration rates;*
- f) Details of overland flood flow routes in the event of system exceedance, with demonstration that such flows can be appropriately managed on site without increasing flood risk to occupants;*
- g) Demonstration that the surface water drainage of the site is in accordance with DEFRA non-statutory technical standards for sustainable drainage systems;*
- h) Full details of the maintenance/adoption of the surface water drainage system;*
- i) Permissions to connect to a receiving watercourse or sewer;*
- j) Measures taken to prevent pollution of the receiving groundwater and/or surface water.*

Reason:

To ensure that the proposed development can be adequately drained and to ensure that there is no increased flood risk on or off site resulting from the proposed development and to ensure that the principles of sustainable drainage can be incorporated into the development, noting that initial preparatory and/or construction works may compromise the ability to mitigate harmful impacts.

Condition 2

No development, including preparatory works, shall commence until details of measures indicating how additional surface water run-off from the site will be avoided during the construction works have been submitted to and approved in writing by the Local Planning Authority. The applicant may be required to provide collection, balancing and/or settlement systems for these flows. The approved measures and systems shall be brought into operation before any works to create buildings or hard surfaces commence.

Reason: To ensure surface water is managed appropriately during the construction phase of the development, so as not to increase the flood risk to adjacent land/properties or occupied properties within the development itself; recognising that initial works to prepare the site could bring about unacceptable impacts.

Informatives

Pollution Control

Surface water and groundwater bodies are highly vulnerable to pollution and the impact of construction activities. It is essential that the risk of pollution (particularly during the construction phase) is considered and mitigated appropriately. It is important to remember that flow within the watercourse is likely to vary by season and it could be dry at certain times throughout the year. Dry watercourses should not be overlooked as these watercourses may flow or even flood following heavy rainfall.

Cambridgeshire and Peterborough NHS (03/07/2023)

- 5.5 Thank you for consulting NHS Cambridgeshire and Peterborough Integrated Care System (CAPICS) on the above referenced, and attached, planning application.

I refer to the above planning application and advise that, further to a review of the applicants' submission, the following comments are with regard to the primary healthcare provision on behalf of CAPICS. The proposed development is likely to have an impact on the services of the GP Practice operating within the vicinity of the application Fenland Group Practice: Doddington Surgery.

Fenland Group Practice has a combined registered patient list size of 13,117 and this development of 14 dwellings would see an increase patient pressure of 32.2 new residents which would require additional GP/Nurse/(Admin support) workforce to support increase in appointments : GP = 0.02 / Nurse = 0.01 and Admin = 0.03 with a resulting increase on estate demand of 2.2 sqm net internal area. The ICB has sought advice from its NHS partner, NHS Property Services Ltd, on recent costs benchmarks for healthcare developments for a single storey extension to an existing premises and refurbishment. This equates to £5,224 per m² (once adjusted for professional fees, fit out and contingency). Having rebased this cost to Fenland using BCIS Tender Price Index, the cost remains the same at £5,224 per m². A developer contribution will be required to mitigate the impacts of this proposal. CAPICS calculates the level of contribution required, in this instance to be £11,534.59.

Payment should be made before the development commences. CAPICS therefore requests that this sum be secured through a planning obligation linked to any grant of planning permission, in the form of a Section 106 planning obligation. In its capacity as the healthcare provider, CAPICS has identified that the development will give rise to a need for additional primary healthcare provision to mitigate impacts arising from the development. The capital required through developer contribution would form a proportion of the required funding for the provision of capacity to absorb the patient growth generated by this development. Assuming the above is considered in conjunction with the current application process, CAPICS would not wish to raise an objection to the proposed development. Otherwise, the Local Planning Authority may wish to review the development's sustainability if such impacts are not satisfactorily mitigated. The terms set out above are those that CAPICS deem appropriate having regard to the formulated needs arising from the development. CAPICS are satisfied that the basis and value of the developer contribution sought is consistent with the policy and tests for imposing planning obligations set out in the NPPF.

FDC Conservation Officer (28/06/2023)

- 5.6 This planning application concerns proposals for a housing development of 14 single storey dwellings on land on the north side of the village of Doddington, abutting gardens to the rear of No. s 43-53 High Street, but which would be located off Wood Street via the new development granted under F/YR17/0406/F. The land proposed for the development is currently a meadow and immediately adjacent to the conservation area boundary and the grade II listed building that is Doddington Windmill, High Street, Doddington (listed 25th October 1951).

Consideration is given to the impact of the proposal on the architectural and historic interests of a listed building with special regard paid to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it

possesses according to the duty in law under S66 Planning (Listed Buildings and Conservation Areas) Act 1990.

Consideration is given to the impact of this proposal on the character and appearance of Doddington Conservation Area with special attention paid to the desirability of preserving or enhancing the character or appearance of that area according to the duty in law under S72 Planning (Listed Buildings and Conservation Areas) Act 1990.

Due regard is given to the planning history associated with the site and surrounding land. A planning application (F/90/0015/O) was refused in 1990 for the development of 17 dwellings and creation of a High Street access (resulting in the demolition of a building fronting the High Street) serving these dwellings and an appeal against this refusal was dismissed. An application was submitted under F/YR17/0406/F for 28 single storey dwellings and this was granted permission and is currently nearing completion of construction. This site is immediately to the North of the current proposed site and was set back circa 75m from the boundary of the conservation area and 55m north of the listed windmill. The proposed new development will be accessed from this site now under construction.

This application is not supported. The following comments are made:

Impact on the Doddington Conservation Area.

The Doddington Conservation Area sits at the heart of the developed village, the developed area accounting for only a small percentage of the parish where the majority of land is arable farmland. The boundaries of the fields surrounding the village are defined by man-made ditches, accentuating the flatness of the Fenland landscape. Arable farming and associated employment played a defining role in the village's prosperity and growth. From the mid-late 20th century, the village of Doddington expanded on its north side as residential development occurred along Wood Street, Carpenter's Way, Burdett Close, The Larches and The Rowen's to the north of the High Street. This residential development is all accessed from Wood Street which is a road off High Street. This existing area of residential development is located outside of the Doddington Conservation Area and the road junction where Wood Street forms off High Street is also outside the conservation area. The Doddington Conservation Area itself focuses on the High Street and Benwick Road and curtilages associated with properties on these streets. It was felt at the time, that the site which is the focus of this proposal would act as a buffer between the 2017 development and the conservation area. The 2017 development relates predominately to the existing mid-late 20th Wood Street residential area. However, the current proposed development, which would be hard up against the Conservation Area boundary would wholly erode the buffer effect of the meadow and close off the remaining views into or out of the conservation area to the open countryside beyond, which is so much part of its setting and agricultural past, and which contributes the character and appearance of the conservation area.

Impact on the setting of the listed building.

The listed windmill sits circa 155m to the north of High Street and is accessed from a track/driveway off High Street. The conservation area appraisal notes that the narrow private track leading to the mill links High Street with the arable farmland to the north of the conservation area. The mill is a brick tower mill of four storeys but without sails or capping and it is located outside of the Doddington Conservation Area. Its offset positioning at the bottom of the track/driveway which serves it is such that you cannot see it when you look down the track/driveway from High Street.

The windmill sits on the settlement edge to the north side of High Street and in this respect, it maintains an isolated position in views looking towards the windmill from surrounding fields despite recent development.

The tower mill is best appreciated from its immediate setting in close range where it can be appreciated in full view sitting in the immediate context of a couple of modern agricultural buildings and when viewing the mill close up you do not immediately take in views of the countryside beyond as these are blocked by a 6ft vertically boarded fence and trees forming the boundary on the windmills north side immediately adjacent to the windmill. However, it is clearly evident that the mill sits at the edge of the settlement and that open countryside lies beyond. This open setting contributes to the significance of the mill, in that it reflects the historic character of the area, the agricultural surroundings and the practical necessity for open land around the mill for wind.

Given the aspects of this listed building's specific setting it was felt the 2017 development, circa 55m to the north, would not harm its setting and the setting of the windmill would be preserved and yet the roofs of the new development are now visible over the top of the fence, altering the setting of the mill.

Conservation Officer comments at the time stated that the meadow which was to act as a buffer between the windmill and the proposed development was important to the setting of the windmill and the sense that it sits on the edge of the settlement as it was intended to when built. This position remains unchanged. Indeed, Historic England guidance on setting states that where the significance of a heritage asset has been compromised in the past by unsympathetic development affecting its setting, to accord with NPPF policies consideration still needs to be given to whether additional change will further detract from the significance of the asset. Negative change could include severing the last link between as asset and its original setting, as would absolutely be the case here. In conclusion, given the level of impact on the setting of the grade II listed mill and on the character and appearance of the conservation area, this development is not supported in principle.

Furthermore, given the proximity of the proposal and the design of the development it is not felt that the development would make a positive contribution to local character and distinctiveness in accordance with paragraph 192 of the NPPF.

The development would amount to less than substantial harm in accordance with paragraph 196 of the NPPF, but this loss of setting and 'buffer' is a considerable and cumulative impact on the significance of the mill and the character and appearance of the conservation area. Furthermore, paragraph 193 of the NPPF states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. Finally, paragraph 194 of the NPPF states that any harm to the significance of a designated heritage asset should require clear and convincing justification. Convincing justification been offered in this case and so no assessment of public benefit outweighing that harm can be made. Policies LP16 a) and d) and LP18 of the local plan are also relevant.

FDC Conservation Officer - Update (24/4/24)

In conclusion, given the level of detrimental impact on the setting of the grade II listed mill and the character and appearance of the conservation area, this development is not supported in principle. Furthermore, given the very close proximity of the proposal to the identified designated heritage assets and the design of the development, it is not considered that the development would make a positive contribution to local character and distinctiveness in accordance with paragraph 192 of the NPPF.

The development would amount to less than substantial harm (medium on the spectrum) as outlined in paragraph 196 of the NPPF, as a result of the loss of setting and erosion of the 'spatial buffer'. It therefore results in a considerable and cumulative less than substantial harm on the significance of the mill and the character and appearance of the conservation area.

Furthermore, paragraph 205 of the NPPF states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation and thus any harm, irrespective of whether the harm amounts to substantial harm or less than substantial harm to its significance should result in a strong presumption to refuse.

Finally, paragraph 206 of the NPPF states that any harm to the significance of a designated heritage asset should require clear and convincing justification. From the submitted information, no convincing justification is considered to have been offered in this case and so no assessment of public benefit outweighing that harm can be made. Local Plan Policies LP16 a) and d) and LP18 of the local plan are also relevant.

FDC Environmental Health (22/06/2023)

- 5.7 *The Environmental Health Team note and accept the submitted information and have 'No Objections' to the proposal, as it unlikely to have a detrimental effect on the local air quality.*

Should planning permission be granted, in the interests of protecting the amenity of existing nearby residencies, it is recommended that a number of issues are addressed from an environmental health standpoint by way of imposing conditions. Given the nature and scale of the proposed development, the issues of primary concern to this service during the construction phase would be the potential for noise, dust and possible vibration to adversely impact on the amenity of the occupiers at the nearest residential properties. Therefore, this service would welcome the submission of a robust Construction Environmental Management Plan (CEMP) that shall include working time restrictions in line with the template for developers, now available on Fenland District Council's website at: [Construction Environmental Management Plan: A template for development sites \(fenland.gov.uk\)](http://fenland.gov.uk) Vibration impact assessment methodology, mitigation measures, monitoring and recording statements in accordance with the provisions of BS 5228-2:2009+A1:2014 Code of Practice for noise and vibration control on construction and open sites may also be relevant, as would details of any piling construction methods / options, as appropriate. It is also recommended that the following condition is imposed: If during development, contamination not previously identified, is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority (LPA)) shall be carried out until the developer has submitted, and obtained written approval from the LPA, a Method Statement detailing how this unsuspected contamination shall be dealt with.

Anglian Water (21/06/2023)

- 5.8 *Section 1 - Assets Affected*

There are assets owned by Anglian Water or those subject to an adoption agreement within or close to the development boundary that may affect the layout of the site. Anglian Water would ask that the following text be included within your Notice should permission be granted. Anglian Water has assets close to or crossing this site or there are assets subject to an adoption agreement. Therefore the site layout should take this into account and accommodate those assets within either prospectively adoptable highways or public open space. If this is not practicable then the sewers will need to be diverted at the developers cost under Section 185 of the Water Industry Act 1991. or, in the case of apparatus under an adoption agreement, liaise with the owners of the apparatus. It should be noted that the diversion works should normally be completed before development can commence.

WASTEWATER SERVICES

Section 2 - Wastewater Treatment The foul drainage from this development is in the catchment of Doddington Water Recycling Centre that will have available capacity for these flows Planning Report

Section 3 - Used Water Network This response has been based on the following submitted documents: Flood Risk Assessment & SUSTAINABLE DRAINAGE STRATEGY Due to lack of information we are unable to make an informed assessment. A full assessment cannot be made due to lack of information, the applicant has not identified a connection point into the public network. Therefore, the development has the potential to have an unacceptable risk of flooding/or pollution from the network. Anglian Water will need to plan effectively for the proposed development, if permission is granted. We will need to work with the applicant to ensure any infrastructure improvements are delivered in line with the development. We therefore request a condition requiring an on-site drainage strategy

INFORMATIVE - Notification of intention to connect to the public sewer under S106 of the Water Industry Act Approval and consent will be required by Anglian Water, under the Water Industry Act 1991. Contact Development Services Team 0345 606 6087.

INFORMATIVE - Protection of existing assets - A public sewer is shown on record plans within the land identified for the proposed development. It appears that development proposals will affect existing public sewers. It is recommended that the applicant contacts Anglian Water Development Services Team for further advice on this matter. Building over existing public sewers will not be permitted (without agreement) from Anglian Water.

INFORMATIVE - Building near to a public sewer - No building will be permitted within the statutory easement width of 3 metres from the pipeline without agreement from Anglian Water. Please contact Development Services Team on 0345 606 6087.

INFORMATIVE: The developer should note that the site drainage details submitted have not been approved for the purposes of adoption. If the developer wishes to have the sewers included in a sewer adoption agreement with Anglian Water (under Sections 104 of the Water Industry Act 1991), they should contact our Development Services Team on 0345 606 6087 at the earliest opportunity. Sewers intended for adoption should be designed and constructed in accordance with Sewers for Adoption guide for developers, as supplemented by Anglian Water's requirements.

Section 4 - Surface Water Disposal The preferred method of surface water disposal would be to a sustainable drainage system (SuDS) with connection to sewer seen as the last option. Building Regulations (part H) on Drainage and Waste Disposal for England includes a surface water drainage hierarchy, with infiltration on site as the preferred disposal option, followed by discharge to watercourse and then connection to a sewer. From the details submitted to support the planning application the proposed method of surface water management does not relate to Anglian Water operated assets. As such, we are unable to provide comments in the suitability of the surface water management. The Local Planning Authority should seek the advice of the Lead Local Flood Authority or the Internal Drainage Board. The Environment Agency should be consulted if the drainage system directly or indirectly involves the discharge of water into a watercourse. Should the proposed method of surface water management change to include interaction with Anglian Water operated assets, we would wish to be reconsulted to ensure that an effective surface water drainage strategy is prepared and implemented.

Section 5 - Suggested Planning Conditions Anglian Water would therefore recommend the following planning condition if the Local Planning Authority is mindful to grant planning approval. Used Water Sewerage Network (Section 3) We have no objection subject to the following condition

Prior to the construction above damp proof course, a scheme for on-site foul water drainage works, including connection point and discharge rate, shall be submitted to and approved in writing by the Local Planning Authority. Prior to the occupation of any phase, the foul water drainage works relating to that phase must have been carried out in complete accordance with the approved scheme. Reason To prevent environmental and amenity problems arising from flooding

Cambridgeshire Fire and Rescue (21/06/2023)

- 5.9 *With regard to the above application, should the Planning Authority be minded to grant approval, the Fire Authority would ask that adequate provision be made for fire hydrants, which may be by way of Section 106 agreement or a planning condition. The position of fire hydrants are generally agreed upon when the Water Authority submits plans to: Water & Planning Manager Community Fire Safety Group Hinchbrook Cottage Brampton Road Huntingdon Cambs PE29 2NA Where a Section 106 agreement or a planning condition has been secured, the cost of Fire Hydrants will be recovered from the developer. The number and location of Fire Hydrants will be determined following Risk Assessment and with reference to guidance contained within the “National Guidance Document on the Provision of Water for Fire Fighting” 3rd Edition, published January 2007. Access and facilities for the Fire Service should also be provided in accordance with the Building Regulations Approved Document B5 Vehicle Access. Dwellings Section 13 and/or Vol 2. Buildings other than dwellings Section 15 Vehicle Access. If there are any buildings on the development that are over 11 metres in height (excluding blocks of flats) not fitted with fire mains, then aerial (high reach) appliance access is required, the details of which can be found in the attached document.*

CCC Growth and Economy (20/06/2023)

- 5.10 *With regards to the planning application consultation F/YR23/0500/F, for 14 dwellings in Doddington, we note that the applicant has submitted a Viability Assessment, which indicates that no developer contributions are likely if this scheme is to proceed. This aside, I can advise that the impact on education and library infrastructure would be as follows: - Child Yield EY children: 2.60 children, of whom 1(0.97) entitled to free provision. PS children: 2.50 children SS children: 1.80 children Early Years - As of August 2022, there were 108 x 0–4-year-olds in the catchment, 45 of whom would be entitled to funded places. Developments in the area are expected to generate an additional 13 x 0–4-year-olds, 9 of whom would be eligible for funded places, making a total of 54 eligible children. At present there is a single EY setting and several childminders operating within the catchment, offering a total of 47 places. This means a shortfall of 9 places, plus those expected from this development (being 1 child). The cost of an EY expansion place is £18,187 based on 1Q22, using the DfE Score Card costing, or £21,774 (1Q22) DfE Score Card cost for a new school place. Contribution: £18,187 x 0.97 = £17,641. Trigger: 100% prior to commencement of development. Primary – The catchment primary school, Lionel Walden, has a total capacity of 210 places. Current (base) catchment forecasts show the school at or below 178 pupils for the next five years. Developments in the catchment area are expected to generate up to 18 primary school age children, for a likely maximum roll of 196. So, there would likely be sufficient primary places to accommodate any children from this development. Secondary – recent analysis showed the total figure for Cromwell Community school - current (base) catchment forecasts, children expected to be generated by other development in the surrounding area - to be a shortfall of 366 places. The cost of a new place is £25,253 based on 1Q22 DfE Scorecard Costs for an expansion place OR £26,366 based on 1Q22 DfE Scorecard for a new school place. Contribution: £25,253 x 1.80 = £45,455. Trigger: 100% prior to commencement of development. Library Provision – this development would likely accommodate 35 people (14 x 2.5). A project to enhance provision at March library would meet pressure from new development, and therefore a contribution of £91 per new head of population would be sought, totally 35 x £91 = £3,185. Trigger: 100% prior to 50% occupation of development. Monitoring fee = £150.*

Cambridgeshire Police – Designing Out Crime (19/06/2023)

- 5.11 *Thank you for the opportunity to comment on this planning application I have viewed the design and access statement (DAS) and supporting documents in relation to crime, disorder, the fear of crime, and community safety. I have researched the constabulary crime and incident systems covering this location for the last two I would consider this to be an area of low vulnerability to the risk of crime. Unfortunately, there doesn't appear to be any specific security or crime prevention section in the design and access statement, whilst the Pedestrian and Vehicle routes are aligned together, there is limited surveillance*

from overlooking properties, many of the habitual rooms are to the rear of the properties, bedrooms located facing the street scene provide little surveillance. Vehicle parking is in curtilage between and to the sides of properties or in garages. Most homes have protected rear gardens which reduces the vulnerability and risks to crime and have been provided with some defensible space to the fronts. I do however have the following comments: - Internal layout I would recommend that the internal layout of the bungalows is reconfigured on several plots to ensure there is an increased amount of natural surveillance from habitual rooms (Kitchen and living rooms), whilst most of these bungalows are positioned facing along the street scene, many of these front facing rooms are bedrooms with the habitual rooms located to the rear. Waveney G - Plots 8 and 9 - currently has a blank gable end and would benefit from a window to the side of the lounge to provide additional surveillance over the street scene and drive. Consideration to relocating Kitchen to front moving bedroom to the rear. Waveney - Plots 5,7 & 12 would it be possible to relocate the kitchen to the front of some to ensure increased surveillance. Lambourne K – Plots 4,6 & 10 – relocate Kitchen to front swap with bedroom. Aldeburgh – Plot 1 – consider installing window to the rear sitting room wall to provide additional surveillance to this area and over private vehicles. Fences – Consider dropping fence height on Plot 10 from 1.8m to 1.5m and installing 300mm trellis, to increase surveillance over vehicles and this rear cul-desac. Lighting I would like to see a copy of the lighting plan including calculations and lux levels once available. For the safety of people and their property our recommendation is that all adopted and un-adopted roads, private and shared drives and parking areas or footpaths and should be lit by columns to BS5489:1 2020. Bollard lighting is only appropriate for wayfinding and should not be used as a primary lighting source for any roads, parking areas or footpaths, where they are also prone to damage. Care should be taken in relation to the location of lighting columns with the entry method for most dwelling burglary being via rear gardens. Lighting columns located next to rear/side garden walls and fences with little surveillance from other properties can be used as a climbing aid to gain entry to the rear gardens. Home security lights both front and rear should be dusk to dawn bulkhead LED lights. Bungalows are typically occupied by more mature members of the community, these persons are more likely to be the victims of burglaries particularly distraction burglaries, by re-orientating rooms within these proposed properties will increase the natural surveillance whilst providing the occupants a safe and secure place to live. I am happy for the above to be conditioned. I am supportive of the design but clarification on the above comments would be appreciated. This has the potential to be a development where there is a strong commitment to community safety and reducing vulnerability to crime, I would encourage the applicant considers submitting a “Secured by Design” 2019 Homes application – this office would be pleased to work with them to attain this award.

CCC Archaeology (16/03/2023)

- 5.12 Thank you for your consultation with regards to the archaeological implications of the above referenced planning application. The proposed development lies in an area of archaeological interest. Within the northern portion of the proposed development is the clear remains of medieval ridge and furrow visible using lidar imagery (Cambridgeshire Historic Environment Record ref MCB24264). Just to the west of the proposed development is the Grade II listed Doddington Windmill and early 19th century example (National Heritage List for England 1126577). Just to the north of the proposed development archaeological evaluations found a number of ditches containing abraded Roman Pot (CHER ECB5320). We previously commented on application F/YR21/0065/F and we confirm that our advice remains the same. Whilst we do not object to development proceeding at this location we consider we consider that the site should be subject to a programme of archaeological investigation secured through the inclusion of a negative condition, such as the example condition approved by DCLG. Archaeology Condition No demolition/development shall commence until the applicant, or their agents or successors in title, has implemented a programme of archaeological work, commencing with the evaluation of the application area, that has been secured in accordance with a Written Scheme of Investigation (WSI) that has been submitted to and approved by the Local Planning Authority in writing. For land that is included within the WSI, no demolition/development shall take place other than under the provisions of the agreed

WSI, which shall include: a. the statement of significance and research objectives; b. The programme and methodology of investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works; c. The timetable for the field investigation as part of the development programme; d. The programme and timetable for the analysis, publication & dissemination, and deposition of resulting material and digital archives. REASON: To safeguard archaeological assets within the approved development boundary from impacts relating to any demolitions or groundworks associated with the development scheme and to ensure the proper and timely preservation and/or investigation, recording, reporting, archiving and presentation of archaeological assets affected by this development, in accordance with national policies contained in the National Planning Policy Framework (MHCLG 2019). Informatives: Partial discharge of the condition can be applied for once the fieldwork at Part c) has been completed to enable the commencement of development. Part d) of the condition shall not be discharged until all elements have been fulfilled in accordance with the programme set out in the WSI. A brief for the recommended programme of archaeological works is available from this office upon request. Please see our website for CHET service charges

FDC Housing Strategy (15/06/2023)

- 5.13 *I note that a viability assessment has been submitted as part of this planning application. I further understand that it is currently being considered by the appropriate officer. In the event that it is concluded that the provision of affordable housing is viable, our Housing needs Policy provisions below apply.*

Fenland Local Plan Policy LP5 Requirements Policy LP5 of the Fenland Local Plan (adopted May 2014) seeks 25% affordable housing on developments where 10 or more homes will be provided On sites of Level of affordable housing Minor developments (5-9 dwellings) Nil affordable housing Major developments (10 or more dwellings) 25% affordable housing (rounded to the nearest whole dwelling) Tenure Mix 70% affordable housing for rent (affordable rent tenure) and 30% other affordable routes to home ownership tenure (shared ownership housing) The Fenland Viability Report (March 2020) To inform the preparation of Fenland's emerging Local Plan, a Viability Assessment was undertaken which looked at the cost of building new homes and the costs associated with the policies in this Local Plan. This report concluded that viability in Fenland is marginal and varies between localities in the district. The assessment indicates that 20% affordable housing is likely to be the maximum level of provision that can be achieved through planning obligations. In response to the report, the Council has confirmed that finding of the viability assessment will be taken into account when determining planning applications from May 2020 onwards. Consequently, while the Council aims to deliver policy compliant 25% affordable Housing provision on qualifying schemes where possible, it is acknowledged that a reduced percentage of affordable housing via planning obligations to a maximum of 20%, will be achievable in most instances. Since this planning application proposes the provision of 14 number of dwellings, our policy seeks to secure a contribution of 25% affordable housing which equates to 4 affordable dwellings in this instance. Based on the provision of 20% affordable housing 3 affordable dwellings would be required in this instance. The current tenure split we would expect to see delivered for affordable housing in Fenland is 70% affordable rented tenure and 30% shared ownership. This would equate to the delivery of 3 affordable rented homes and 1 shared ownership based on the provision of 25% affordable housing or 2 affordable rented homes and 1 shared ownership based on the provision of 20% affordable housing. The provision of on-site affordable housing or a financial contribution Where affordable housing is due, the policy indicates that the affordable housing will be provided on site unless there are exceptional circumstances which necessitate provision on another site or the payment of a financial contribution. Since 2016 Fenland has had arrangements in place to mitigate the difficulty of implementing an on-site policy for sites with a planning obligation to deliver less than 10 affordable homes. These arrangements are regularly reviewed to ensure that they continue to accurately reflect the challenges of securing small scale on site affordable housing delivery through planning obligations. This arrangement has been reviewed in response to the findings of the Viability Assessment and the potential for variations in the percentage of affordable housing delivery that is likely to be achievable

through planning obligations, depending on the location of the site within the local authority district area. Accordingly, Fenland's current approach is to agree that sites that yield less than 10 (i.e. 9 or fewer) affordable homes through planning obligations can be discharged by way of a financial contribution rather than on-site provision. The application of this arrangement is not dependent on the total number of dwellings seeking consent for delivery, instead, it is triggered by the number of affordable homes that are deliverable. If the applicant chooses to provide a financial contribution rather than seek an RP partner to deliver the on-site affordable housing, the affordable housing financial contribution will be calculated in accordance with the mechanism provided in the Local Plan policy and as follows: The applicant should submit the necessary open market values of homes which would otherwise have been affordable housing to FDC. FDC will assume that RPs would usually pay 55% of OMV for a rented dwelling and 65% of OMV for a shared ownership dwelling. FDC will assume that 70% of all affordable homes will be rented tenure and 30% will be shared ownership tenure

CCC Ecology (07/08/2023)

5.14 Thank you for your consultation letter received on 26 Jun 2023 regarding the above planning application. We recommend refusal of this application due to lack of biodiversity information. This matter can be resolved through the submission of further bat survey work and detailed BNG metric spreadsheet to the LPA prior to the determination of the planning application. Please find further details below: The updated Preliminary Ecological Appraisal (PEA, Phillip Parker, Associates 2023) has found a Brown-Long Eared feeding perch within the building schedule to be demolished as part of the scheme. The PEA recommends further bat surveys to confirm the importance of this site for roosting bats. This survey work has not been submitted as part of the application and therefore, it is not possible to determine the level of impact of the scheme on bats and whether the proposed mitigation is adequate. A Biodiversity Net Gain report has been submitted as part of the scheme, however, we cannot find a copy of the BNG metric spreadsheet upon which it is based. It is therefore not possible to interrogate the data to confirm whether or not the summary within the BNG report is accurate. Consequently, it is not possible to determine if the scheme accords with National Planning Policy Framework 2021 (paragraphs 174 & 180-182) or the following Fenland Local Plan 2014 policies to conserve and enhance biodiversity:

- LP16: "Proposals for all new development... will only be permitted if it can be demonstrated that the proposal... "protects and enhances biodiversity on and surrounding the proposal site, taking into account locally designated sites and the special protection given to internationally and nationally designated sites, in accordance with Policy LP19"
- LP19: "conserve, enhance and promote the biodiversity and geological interest of the natural environment throughout Fenland". Furthermore, the local authority is unable to discharge its statutory duty to conservation biodiversity (Natural Environment and Rural Communities Act 2006) and protect Protected Sites and species of European importance (Conservation of Habitats and Species Regulations 2017).

We therefore recommend refusal until the following information is provided prior to determination:

- Further Bat Survey Work
 - Biodiversity Net Gain Assessment – accompanying Defra Metric excel spreadsheet
- Planning Obligations / Conditions Notwithstanding the above recommended refusal - if planning permission is granted, it is expected that condition(s) will be required to ensure protection and enhancement of biodiversity is secured as part of the scheme: The proposal is acceptable on ecology grounds, providing that the follow information to protect and enhance biodiversity is secured through suitably worded planning condition(s):

1. Construction Environment Management Plan
2. Landscape and Ecological Management Plan
3. Off-site BNG Plan*

4. *Lighting Design Strategy for Biodiversity*
5. *Protected Species Licence - Bats*
6. *Time Limit on Development before further biodiversity surveys required*
7. *Informative – Breeding Birds* In addition, the Applicant is proposing to provide approximately £21,000 contribution to Lattersey Local Nature Reserve to deliver biodiversity enhancement and off-set the loss of biodiversity (BNG) as part of the scheme. We understand this approach has been agreed with the LPA's previous ecological advisor. *We are unclear exactly what the contribution will deliver and therefore, if planning permission is granted, suggest that an off-site BNG Plan be secured through a suitably worded condition (as listed above). In addition, we recommend the financial contribution be secured through appropriate planning mechanism (e.g. planning obligation).

CCC Ecology (10/4/24)

We welcome the submission of the updated Preliminary Ecological Appraisal, updated Biodiversity Net Gain Report, Metric 3.1 and the updated Bat Report, which sets out the findings of the bat surveys and proposed mitigation for loss of a bat roosts (Long Eared feeding perch). This information resolves our previous concerns. Therefore, we remove our recommendation for refusal.

Planning obligations / conditions: The proposal is acceptable on ecology grounds, providing that the following information, and funding off-site BNG at Lattersey Nature Reserve, can be secured through suitably worded planning obligations / conditions. We provided a list of conditions set out in our consultation response of 07 August 2023 (ref. FYR230500F_ECO_20230807), which still stand. We also recommend an additional planning condition to ensure the applicant provides the LPA with a cop of the Natural England bat licence, prior to demolition of the on-site building containing the bat roost.

1. SUGGESTED DRAFT CONDITION: European Protected Species Licence (bats) No vegetation removal or demolition of the outbuilding identified in the Update Bat Surveys of On Site Building report (Ref. P2021-52 R4 A) shall not in any circumstances commence unless the local planning authority has been provided with either: a) a licence issued by [the relevant licensing body' pursuant to Regulation 53 of The Conservation of Habitats and Species Regulations 2017 authorizing the specified activity/development to go ahead; or b) a statement in writing from the relevant licensing body to the effect that it does not consider that the specified activity/development will require a licence Reason: Fenland Local Plan 2014 policies LF16 & LF19 & Conservation of Habitats and Species Regulations 2017 (as amended) (to protect biodiversity)

2. SUGGESTED DRAFT CONDITION: Construction Ecological Management Plan No development shall take place (including demolition, ground works and vegetation clearance) until a Construction Ecological Management Plan (CEMP: Biodiversity) has been submitted to and approved in writing by the local planning authority. The CEMP (Biodiversity) shall incorporate recommendations of the updated Preliminary Ecological Appraisal and Update Bat Surveys of On Site Building report and must include the following: a) Risk assessment of potentially damaging construction activities. b) Identification of "biodiversity protection zones". c) Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements) d) The location and timings of sensitive works to avoid harm to biodiversity features. e) The times during which construction when specialist ecologists need to be present on site to oversee works. f) Responsible persons and lines of communication. g) The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person. h) Use of protective fences, exclusion barriers and warning signs if applicable. The approved CEMP shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details, unless otherwise agreed in writing by the local planning authority. Reason: Fenland Local Plan 2014 policies LF16 & LF19 (to protect biodiversity)

3. SUGGESTED DRAFT CONDITION: Landscape and Biodiversity Enhancement Scheme (on-site) Within 6 months of the date of this approval, a scheme for the landscaping and biodiversity enhancements and habitat improvements as set out within the approved Preliminary Ecological Appraisal at the site shall be submitted to and approved in writing by the Local Planning Authority. The landscaping and biodiversity enhancement details to be submitted shall include: a) planting plans to all areas, retained hedge and trees, species, numbers, size and density of planting; the planting shall be sufficient to result in overall no net loss of biodiversity, b) placement, type, number and details of any recommended biodiversity enhancements and habitat improvements, c) bat mitigation set out in the updated Update Bat Surveys of On Site Buildings report (and any updates in the European Protected Species licence) c) means of enclosure noting that all new garden fencing should be designed to allow hedgehogs to be able to pass through the fencing. d) details of siting and timing of all construction activities to avoid harm to all nature conservation features e) [additional details from landscape officer....] f) a timetable for landscaping and biodiversity enhancement implementation. g) management and maintenance details The approved landscape and biodiversity enhancement scheme shall be carried out within 6 months of the approval of the scheme. The approved landscape scheme shall be carried out within the first available planting season following approval of the scheme and in accordance with the timetable for implementation approved as part of the submitted scheme. The approved landscape and biodiversity enhancement scheme shall be maintained thereafter in perpetuity. Reason: Fenland Local Plan 2014 policies LF16 & LP19 (to protect and enhance biodiversity)

4. SUGGESTED DRAFT CONDITION: Landscape and Ecological Management Plan A landscape and ecological management plan (LEMP) shall be submitted to and be approved in writing by the local planning authority prior to the operational phase of the development. The content of the LEMP shall include the following: a) Description and evaluation of features to be managed. b) Ecological trends and constraints on site that might influence management. c) Aims and objectives of management. d) Appropriate management options for achieving aims and objectives (including biodiversity net gain). e) Prescriptions for management actions f) Preparation of the work schedule (including an annual work plan capable of being rolled forward over a 30 year period and BNG audit) g) Details of the body or organisation responsible for implementation of the plan h) Ongoing monitoring and remedial measures The LEMP shall also include details of the legal and funding mechanism(s) by which the longterm implementation of the plan will be secured by the development with the management body(ies) responsible for its delivery. The plan shall also set out (where the results from monitoring show that conservation aims and objectives of the LEMP are not being met) how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme. A 5 yearly report shall be submitted to the LPA confirming the progress of the LEMP and results of any monitoring work. The LEMP shall be implemented in accordance with the approved details and all features shall be retained in the manner thereafter in perpetuity. Reason: Fenland Local Plan 2014 policies LF16 & LF19 (to protect and enhance biodiversity)

5. Off-site BNG Plan; No development shall commence, apart from below ground works and demolition, until a Biodiversity Net Gain (BNG) Plan has been submitted to and approved in writing by the local planning authority. The off-site BNG Plan shall target how a net gain in biodiversity will be achieved through a combination of on-site and off-site mitigation at Lattersey Nature Reserve. The BNG Plan shall include: i) A hierarchical approach to BNG focussing first on maximising on-site BNG, second delivering off-site BNG at a site(s) of strategic biodiversity importance, and third delivering offsite BNG locally to the application site; ii) Full details of the respective on and off-site BNG requirements and proposals resulting from the loss of habitats on the development site utilising the latest appropriate DEFRA metric; iii) Identification of the existing habitats and their condition on-site and within receptor site(s); iv) Habitat enhancement and creation proposals on the application site and /or receptor site(s) utilising the latest appropriate DEFRA metric; v) An implementation, management and monitoring plan (including

identified responsible bodies) for a period of 30 years for on and off-site proposals as appropriate. The off-site BNG Plan shall be implemented in full and subsequently managed and monitored in accordance with the approved details. Monitoring data as appropriate to criterion v) shall be submitted to the local planning authority in accordance with the latest DEFRA guidance and the approved monitoring period / intervals.

Reason: Fenland Local Plan 2014 policies LF16 & LF19 (to protect biodiversity)

6. **SUGGESTED DRAFT CONDITION: Lighting Design Strategy for Biodiversity** Notwithstanding the submitted details, and within 6 months of the date of this approval, a "lighting design strategy for biodiversity" in accordance with ILP Publications' "Guidance Note 8 Bats and artificial lighting" shall be submitted to and approved in writing by the Local Planning Authority for all existing and proposed lighting within the development hereby permitted. Prior to occupation, a lighting design strategy for biodiversity shall be submitted to and approved in writing by the local planning authority. The strategy shall:

- a. identify those areas /features on site that are particularly sensitive for bats and that are likely to cause disturbance in or around their breeding sites and resting places or along important routes used to access key areas of their territory, for example, for foraging;
- and b. show how and where external lighting will be installed (through the provisions of appropriate lighting contour plans and technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent the above species using their territory or having access to their breeding sites and resting places. All external lighting shall be installed in accordance with the specifications and locations set out in the strategy, and these shall be maintained thereafter in accordance with the strategy. Under no circumstances should any other external lighting be installed without prior consent from the local planning authority. Reason: Fenland Local Plan 2014 policies LF16 & LF19 (to protect biodiversity)

7. **SUGGESTED CONDITION: Time Limit on Development Before Further Surveys are Required** If the development hereby approved does not commence (or, having commenced, is suspected more than 12 months) within 1 years from the date of the planning consent, the approved ecological measures secured through [INSERT BIODIVERSITY CONDITIONS: e.g. CEMP, LEMP, Lighting Scheme] shall be reviewed and, where necessary, amended and updated. This review shall be informed by further ecological surveys commissioned to i) establish if there have been any changes in the species / habitats present at the site and ii/ identify any likely new ecological impacts that might arise from any changes. The amended documents shall be submitted to and approved in writing by the local planning authority prior to commencement of development. Works must be carried out in accordance with the proposed new approved ecology measures and timetable. Reason: Fenland Local Plan policies LF16 & LF19 (to protect biodiversity)

8. **SUGGESTED DRAFT INFORMATIVE – Breeding Birds** The Applicant is reminded that under the Wildlife and Countryside Act 1981, as amended (section 1), it is an offence to remove, damage or destroy the nest of any wild bird while that nest is in use or being built. Planning consent for a development does not provide a defence against prosecution under this act. Trees and scrub are likely to contain nesting birds between 1st March and 31st August inclusive. Trees / scrub are present on the application site and are to be assumed to contain nesting birds between the above dates, unless a recent survey has been undertaken by a competent ecologist to assess the nesting bird activity on site during this period and has shown it is absolutely certain that nesting birds are not present. Reason – Wildlife and Countryside Act 1981 (protection of wild birds, their nests, eggs and young)

FDC Independent Viability Assessor

5.15 We find that the scheme is viable with either of the following:

- 2 onsite affordable units (14.29%) plus S106 payments totalling £49,000
- Or an offsite commuted sum of £175,000 plus S106 payment of £49,000.

5.16 East of England Ambulance Service NHS

Thank you for consulting East of England Ambulance Service NHS Trust (EEAST) on the above planning application. This letter outlines the impact on emergency ambulance healthcare infrastructure arising from the application.

Please accept this letter as EEAST's position on emergency ambulance healthcare capacity and need arising from this planning application and a financial contribution sought if Fenland District Council is minded to grant planning permission and is in line with Fenland IDP Policies LP2, LP3 and LP9.

Assessment of Development Impact on Emergency Ambulance Service Provision

This development, should the application be successful, will affect March ambulance stations as well as Ely, St Ives and Peterborough Hub and ambulance stations which respond to emergency incidents within the local area as well as impact on the regional call centres.

Travel times from March Ambulance Station in rush hour traffic to the development location are circa 15 minutes (Reference ShapeAtlas) and around 30 minutes from the other ambulance stations which support Doddington (NB this is a standard reference point and does not mean ambulances come from these locations in order to respond to calls).

For these reasons, in order to make this development acceptable it is requested a capital contribution from developers is made towards the provision Emergency Ambulance Service Infrastructure which may be the nearest Hub, local ambulance station(s), provision of additional ambulance vehicles to support the population growth from this development.

Table 2 Capital Cost calculation of additional emergency ambulance health services arising from the development proposal

No Dwellings	Infrastructure Cost*	Total
14	£327	£4,578

** Adjusted pro-rata for 2.4 person per dwelling. EEASTs baseline infrastructure cost* calculation of £300 is based on 2.2 persons per dwelling as submitted to Fenland IDP Regulation 18 consultation October 2022*

Capital infrastructure cost calculation takes the population in EEAST (6.3m) / number of Incidents in 2023/24 (1.4m) = 0.22 incidents per person per annum and multiplies this against the Capital Infrastructure Costs of £300 per 2.2 persons per dwelling and adjusted pro-rata:

Capital Infrastructure Cost of £340 per 2.2 person dwelling is calculated using 2023/24 costs required to deliver a mobile emergency healthcare service:

Estates build per m² (£213.50) + Patient facing emergency ambulance vehicles (£126.50)

*The capital required to create additional ambulance services to support the population arising from the proposed development is calculated to be **£4,578** and are for the impact of this development only.*

Emergency Ambulance Capital Funding

Ambulance stations supporting residents in this development area are deemed aged,

capacity constrained and no longer fit for modern ambulance services to deliver Make Ready Services as defined under the Lord Carter Report (2018) and mandated by Quality Care Commission (CQC).

The capital required would provide financial resources for EEAST to absorb the additional patient demand generated by this development on emergency ambulance health services. New developments place additional demand on our existing infrastructure without any direct associated funding.

EEAST, as with all NHS Trusts, is allocated an annual capital spend limit (CDEL), which is generally used to support maintenance backlog/and replacement of existing fleet vehicles and onboard essential capital medical equipment, both of which have a maximum lifespan of 5 years before being replaced.

For this reason our request for capital funding is distinct from revenue income from NHS England.

This additional capital funding would be allocated, in agreement with the local council, to support:

-creation of an additional ambulance station/response post in a more suitable location to meet the increased local demand arising from this housing development.

EEAST is commissioned by Suffolk and North East Essex ICS on behalf of all ICSs throughout Bedfordshire, Cambridgeshire, Essex, Hertfordshire, Norfolk and Suffolk:

- Make sure patients with serious or life-threatening injuries and illnesses get the care they need 24 hours a day, 365 days a year
- Receive 3,600+ emergency calls every day which are categorised by call handlers in our ambulance operations centres in Bedford, Chelmsford and Norwich
- A traditional ambulance may not be first on scene, this could be a Community First Responder, rapid response vehicle with an emergency care practitioner, paramedic or emergency medical technician, emergency doctor or air ambulance
- Provide See and Treat, Hear and Treat services and transport patients to one of 17 acute hospital or other healthcare settings
- Our hazardous response teams and resilience department are responsible for all emergency preparedness, resilience and responds dealing with all internal and external emergency planning and respond to significant/ major incidents and, to provide specialist advice to our command team.
- A HART vehicle and appropriately trained staff are sent to locations which are within 3 meters of water.

EEAST are required to meet the NHS ambulance standard response times (see Table 1 below). for a life-threatening incident (Category 1), may require up to 4 vehicles to manage the incident. This could include community first responder, rapid response vehicle and one or more DSAs are sent to this type of incident. On average, a face-to-face incident requiring transport to hospital will utilise an ambulance for 2 hours.

Table 1 Ambulance Quality Operational Standard 2024/25

Operational Standards	90th Percentile (No Greater Than)	Mean (No Greater Than)
Category 1 (life-threatening) incidents – proportion of incidents resulting in a response arriving within 15 minutes	15 minutes	7 Minutes
Category 2 (emergency) incidents – proportion of incidents resulting in an appropriate response arriving within 40 minutes	40 minutes	30 Minutes
Category 3 (urgent) incidents – proportion of incidents resulting in an appropriate response arriving within 120 minutes	120 minutes	-

<i>Category 4 (less urgent “assess, treat, transport” incidents only) – proportion of incidents resulting in an appropriate response arriving within 180 minutes</i>	180 minutes	-
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In 2023/24 for our population across the East of England of 6.1m we received 1,384,547 emergency calls:

- *92% patients received a face-to-face intervention with the remainder managed through Hear and Treat*
- *55.0% patients attended required conveyance to emergency department*
- *equates to 0.23 calls per person per annum.*

Local Residents/Interested Parties

5.17 32 letters of objection received from residents at Doddington (31) and Wimblington (1) with points summarised below:

- First stage hasn't been completed
- Issues with drainage/flooding
- Infrastructure incapable of accommodating more dwellings
- Questioning viability
- Intrusive during construction
- Loss of outlook
- Impact upon heritage assets
- Impact upon biodiversity
- Loss of privacy to neighbours
- Sustainability of the site
- Questioning provision of boundary fencing

7no. letters of support received from residents at Doddington with points summarised:

- Need more bungalows in the village
- Bungalows will encourage retired/semi-retired
- No known flooding issues
- Anglian Water recently upgraded sewage treatment

6 STATUTORY DUTY

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires a planning application to be determined in accordance with the Development Plan unless material planning considerations indicate otherwise. The Development Plan for the purposes of this application comprises the adopted Fenland Local Plan (2014).

Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 require Local Planning Authorities when considering development to pay special attention to preserving a listed building or its setting and to the desirability of preserving or enhancing the character or appearance of a conservation area.

7 POLICY FRAMEWORK

National Planning Policy Framework (NPPF)

National Planning Practice Guidance (NPPG)

National Design Guide 2021

Fenland Local Plan 2014

LP1 – A Presumption in Favour of Sustainable Development
LP2 – Facilitating Health and Wellbeing of Fenland Residents
LP3 – Spatial Strategy, the Settlement Hierarchy and the Countryside
LP4 – Housing
LP5 – Meeting Housing Need
LP12 – Rural Areas Development Policy
LP13 – Supporting and Managing the Impact of a Growing District
LP14 – Responding to Climate Change and Managing the Risk of Flooding in Fenland
LP15 – Facilitating the Creation of a More Sustainable Transport Network in Fenland
LP16 – Delivering and Protecting High Quality Environments across the District
LP17 – Community Safety
LP18 – The Historic Environment
LP19 – The Natural Environment

Emerging Local Plan

The Draft Fenland Local Plan (2022) was published for consultation between 25th August 2022 and 19 October 2022, all comments received will be reviewed and any changes arising from the consultation will be made to the draft Local Plan. Given the very early stage which the Plan is therefore at, it is considered, in accordance with Paragraph 48 of the NPPF, that the policies of this should carry extremely limited weight in decision making. Of relevance to this application are policies:

LP1 Settlement Hierarchy
LP2: Spatial Strategy for the Location of Residential Development
LP7 Design
LP8 Amenity Provision
LP12 Meeting Housing Needs
LP18 Development in the Countryside
LP20 Accessibility and Transport
LP22 Parking Provision
LP23: Historic Environment
LP24: Natural Environment
LP27 Trees and Planting
LP28 Landscape
LP31 Open Space and Recreational Facilities
LP32 Flood and Water Management

8 KEY ISSUES

- **Principle of Development**
- **Developer Contributions/Affordable Housing**
- **Visual amenity/Design/Impact on Heritage Assets**
- **Residential amenity**
- **Highways/Access**
- **Flood Risk/Drainage**
- **Biodiversity**
- **Other Issues**

9 BACKGROUND

9.1 Planning permission was granted for 28 bungalows on the land to the north of the application site under application F/YR17/0406/F. At this time, the Local Planning Authority could not demonstrate a five-year housing land supply and so the tilted balance was engaged. This development has largely been completed and it is via this development that the access to serve this site is sought.

- 9.2 Application F/YR21/1386/F was refused for the erection of 16 x dwellings due to impact upon the conservation area and setting of a listed building; biodiversity; residential amenity and failure to submit a s106 agreement.
- 9.3 This current submission seeks to address the previous reasons for refusal. It proposes a reduction in the number of dwellings to 14 no single storey dwellings accessed via Juniper Close. The layout has also been amended from the previous submission, in particular the removal of dwellings in close proximity to No. 8 & 9 The Larches. An additional area of open space has been included along with a shrubby thicket, to ensure a buffer is given between the existing and new dwellings.
- 9.4 Further to the above, a revised Heritage Statement has been submitted as part of this application which sought to better analyse the scheme against National and Local Planning policies. Additional biodiversity information has been submitted as and a detailed plan setting out the biodiversity achievements of the site is included.
- 9.5 Another reason for refusal on the previous scheme was due to the lack of a s106 agreement or the submission of a Viability Assessment. This application has been supplemented with a Viability Assessment. Upon consultation with the Council's independent assessor, it was concluded that the scheme is viable and is addressed within the assessment.

10 ASSESSMENT

Principle of Development

- 10.1 Doddington is a growth village as set out in the spatial strategy and settlement hierarchy within Policy LP3 of the Local Plan. For these settlements, development and new service provision within the existing urban area or as small village extensions will be appropriate albeit of a considerably more limited scale than that at Market Towns. A note to this policy states that development at Wimblington and Doddington will be appropriate providing that the capacity at or in the sewerage network leading to the Waste Water Treatment Work at Doddington can be addressed.
- 10.2 The site is not within the existing urban area *per se* but could be classed as a small urban extension with recent development to the north of the site having been built out. However, the site is countryside and paragraph 180 (b) of the NPPF requires decisions to contribute to and enhance the natural and local environment by recognising the intrinsic character and beauty of the countryside and the wider benefits from natural capital and ecosystem services.
- 10.3 In considering just the location of the site, given that it adjoins the existing urban area to the north and east, at least for the majority of its boundary, the principle of the development would be acceptable and would comply with Policy LP3 of the Local Plan. However, there is one detailed aspect of the site and surroundings that render the proposal unacceptable. All other material considerations are discussed below.
- 10.4 The site is one of the proposed residential allocations in the emerging Local Plan but at present this is at such an early stage that it carries little weight. Additionally, the considerations during the process as to whether to include the site in the proposed allocations would not be as in depth as the considerations undertaken as part of the assessment of this application.
- 10.5 The previous refused scheme did not cite an in-principle issue, and with no subsequent significant policy changes since, the application is considered to be acceptable in principle subject to other issues addressed further in the report.

Developer Contributions/Affordable Housing

- 10.6 Policy LP5 Part A of the Local Plan requires developments of 10 or more houses to provide 25 percent of the dwellings as affordable houses, the exact tenure mix to be informed by an up-to-date housing needs assessment. This should form the basis of a S106 Agreement to accompany the submission.
- 10.7 Policy LP13 of the Local Plan sets out that planning permission will only be granted if there is sufficient infrastructure capacity to support and meet all the requirements arising from the proposed development.
- 10.8 The National Planning Practice Guidance (NPPG) states that planning applications that fully comply with up-to-date policies that have set out the contributions from developments, they should be assumed to be viable. It further states that it is up to the applicant to demonstrate the need for a viability assessment at the application stage.
- 10.9 The application form states that all of the proposed housing will be for the open market. In this instance and following on from application F/YR21/1386/F which was refused for 16 dwellings due to the failure to submit a s106 agreement to secure financial and infrastructure contributions generated by the proposed development, this application has been accompanied by a 'Viability Assessment' in accordance with paragraph 58 of the NPPF (2023).
- 10.10 The submitted Viability Assessment case was thoroughly reviewed by an independent property surveyor appointed by the Council. The viability assessment establishes a benchmark land value (BLV) (the land value now) along with a residual land value (RLV) generated by the development (the value of the development after implementation) and then undertakes a comparison of the RLV against the BLV to establish the viability of the development. In simple terms, if there is a surplus then the scheme can be considered to be viable and if there is a deficit then the scheme can be considered to be unviable. Through consultation with the independent assessor appointed by the Council, it is concluded, that the scheme is viable with planning policies applied for either:
- 2 on site affordable units (14.29%) plus s106 contributions totalling £49,000
 - Or an offsite commuted sum of £175,000 plus s106 contributions of £49,000
- 10.11 The applicants will not be providing a policy compliant scheme with regards to on-site provision of affordable homes, however, through correspondence with the agent following the assessor's conclusion, it has been confirmed that they would be willing to make the offsite affordable housing commuted sum payment of £175,000 plus contributions totalling £49,000 towards education; NHS and off site contributions to offset biodiversity loss through a s106 agreement. Heads of Terms have been agreed, therefore should the application be approved, it would be subject to a s106 agreement. It is also noted the East of England Ambulance service submitted comments following agreement of the Heads of Terms, however, there is uncertainty as to whether this would be CIL compliant so this would need to be addressed further but could form part of any Section 106 agreement.

Visual amenity/Layout/Design and Impact upon Heritage Assets

- 10.12 Consideration is given to the impact of the proposal on the architectural and historic interests of a listed building with special regard paid to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses according to the duty in law under S66 Planning (Listed Buildings and Conservation Areas) Act 1990.
- 10.13 Consideration is given to the impact of this proposal on the character and appearance of Doddington Conservation Area with special attention paid to the desirability of preserving or enhancing the character or appearance of that area according to the duty in law under S72 Planning (Listed Buildings and Conservation Areas) Act 1990.

- 10.14 Paragraph 131 of the NPPF states that that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.
- 10.15 Paragraph 135 of the NPPF states that Planning policies and decisions should ensure that developments function well and add to the overall quality of the area and are visually attractive as a result of good architecture, layout and appropriate and effective landscaping. Developments should be sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities).
- 10.17 Paragraph 201 of the NPPF states that local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.
- 10.18 Paragraph 205 of the NPPF states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.
- 10.19 Paragraph 208 of the NPPF states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.
- 10.20 Policy LP16 of the Local Plan states that proposals for all new development, will only be permitted if it can be demonstrated that the proposal meets certain criteria, inter alia, (d) makes a positive contribution to the local distinctiveness and character of the area, enhances its local setting, responds to and improves the character of the local built environment, provides resilience to climate change, reinforces local identity and does not adversely impact, either in design or scale terms, on the street scene, settlement pattern or the landscape character of the surrounding area and that the development protects and enhances any affected heritage assets and their settings to an extent that is commensurate with the NPPF and in accordance with policy LP18.
- 10.21 Policy LP18 sets out that the Council will protect, conserve and seek opportunities to enhance the historic environment throughout Fenland. This will be achieved by consideration of planning applications amongst other things. The policy states that all proposals that would affect any designated or undesignated heritage asset will be required to:
- Describe and assess the significance of the asset and/or its setting to determine its architectural, historic or archaeological interest; and
 - Identify the impact of proposed works on the special character of the asset; and
 - Provide clear justification for the works, especially if these would harm the asset or its setting, so that the harm can be weighed against public benefits
- 10.22 The Grade II Listed Doddington Windmill is situated to the northeast corner of the curtilage of The Mill House and is adjacent to west of the proposed site. The application site is not within a Conservation Area however the southern site boundary borders Doddington Conservation Area. Due to the constraints of the site, and in order to accommodate the proposed number of dwellings, the layout includes a central road

running north to south around which the dwellings are located. There is a proposed surface water attenuation basin towards the north-west of the site which abuts the curtilage to the listed windmill.

- 10.23 The generous nature of the plot coupled with the layout proposed ensures that the quantum of the development can be appropriately accommodated on the site without appearing unduly cramped or overdeveloped, and, due to the pattern of development in the locality it is similar in its arrangement. All of the proposed dwellings are bungalows which reflects the development to the north of the site in Juniper Close and is similar in terms of density. The development to the east in The Larches and Sutton Way comprises largely two storey dwellings in larger plots. The dwellings to the immediate south are those off High Street i.e. within the historic core of the village and within the Conservation Area. To the west is the large detached residential property, Mill House which is set in large grounds and to the northeast of these grounds is the Grade II Listed windmill.
- 10.24 There is no uniformity in the locality with regards to materials. The plans and application form state the use of several materials throughout the site. In terms of the design of the properties, they are considered to be of a reasonable quality and given its context, the proposed material pallet is considered to be acceptable ensuring this will not adversely affect the character of the area or the street scene.
- 10.25 The site lies outside but abuts the Conservation Area to the south. However, from the development pattern, hedgerow lines and looking at the old maps within the Council's mapping system it seems apparent that this land was associated with pastoral hinterland beyond the built-up High Street and was and is different in character to the large open agricultural fields further to the north. Indeed, there are two parcels of such land which extend back from the High Street which are included in the Conservation Area whereas the southern two thirds of this site have not been included in the Conservation Area. Nevertheless, the land does add to the open character typified by these remaining pockets of land in this vicinity which lie between built up areas.
- 10.26 An updated Heritage Statement was appended to the submission but there is a stark contrast between the opinion of the applicant's heritage consultant and those of the Council's Conservation Officer with regard to the value of the settings of the listed mill and the Conservation Area and the impact of the proposed development on those heritage assets. Paragraph 4.24 of the Heritage Statement places emphasis on the fact that the boundary south of the site has been divorced from its landscape setting with it being concluded within paragraph 4.26 that the site therefore does not make an important visual contribution to the setting of the Conservation Area.
- 10.27 This is contested by the Council's Conservation Officer and the proposed development, which would be hard up against the Conservation Area boundary, is considered to wholly erode the buffer effect of the meadow and close off the remaining views into or out of the conservation area to the open countryside beyond, which is so much part of its setting and agricultural past, and which contributes the character and appearance of the Conservation Area.
- 10.28 The heritage statement places emphasis on the ability to view the listed mill in terms of the contribution that the site makes to its setting and sets out at that the mill is read within the context of modern housing developments to the east. The Heritage Statement continues to focus on vantage points of the mill. It further states that the visual prominence of 14 bungalows is low and that the placement of the balancing pond adjacent to the mill will create public vantage points.
- 10.29 However, it is clearly evident that the mill sits at the edge of the settlement and that open countryside lies beyond. This open setting contributes to the significance of the mill, in that it reflects the historic character of the area, the agricultural surroundings and the practical necessity for open land around the mill for wind. Given the aspects of this listed building's specific setting, it was felt the 2017 development which lies circa 55m to the

north would not harm its setting and the setting of the windmill would be preserved. Conservation Officer comments at the time stated that the meadow which was to act as a buffer between the windmill and the proposed development was important to the setting of the windmill and the sense that it sits on the edge of the settlement as it was intended to when built. This position remains unchanged.

- 10.30 In conclusion, given the level of negative impact on the setting of the Grade II listed mill and on the character and appearance of the Conservation Area, this development is not supported in principle in heritage terms. Furthermore, given the proximity of the proposal and the design of the development it is not felt that the development would make a positive contribution to local character and distinctiveness in accordance with paragraph 196 of the NPPF.

Public benefits

- 10.31 Paragraph 208 of the NPPF states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.
- 10.32 The Heritage Assessment states that 'as per paragraph 202 of the NPPF, this needs to be balanced against the countervailing benefits. These benefits and justification for the scheme as required by criterion (c) of Local Plan Policy LP18 are set out in the accompanying Planning Statement.'
- 10.33 In this instance, the public benefits of the proposal would see the delivery of 14 sustainably built bungalows which have been designed to meet NDSS standards to provide future residents with high quality accommodation and sufficient internal amenity space. All of the dwellings would meet NDSS and M4(2) standards. There is proposed limited economic benefits in terms of employment opportunities during the construction phase. It is also clear that the site won't deliver affordable housing on site and, as such, the delivery of market housing only carries moderate weight in favour of the development, particularly given the Council's proven housing land supply and delivery in recent years.
- 10.34 The statement also references that the formation of a new access road into the site would allow for far closer public views of the mill and that the layout of the site would enable an open setting to be retained adjacent to the mill where it will be viewable with potential for interpretation to be subtly included in this locality. The applicant considers that these two benefits carry significant weight given the limited ability by which the mill can be viewed from the public realm at present.
- 10.35 In response, it is not agreed that placing development of bungalows and an attenuation pond adjacent to a listed mill thus removing an open rural setting provides credible public benefits and that views of the mill and the conservation area from the developed site would not constitute public benefits which would outweigh the harm. It is not considered that increased interpretation of the mill is a plausible benefit either, acknowledged by the Conservation Officer.
- 10.36 The loss of this open land and construction of 14 dwellings and an attenuation pond does not preserve the setting of the listed mill, neither does it preserve or enhance the character of the conservation area. The significance of each has been set out in the detailed response from the Council's Conservation Officer. It is considered that taking all of this into consideration, these matters do not amount to public benefits that would outweigh the less than substantial harm resulting in the reduction in the significance to the setting of both the listed mill and the conservation area. As such the proposal is contrary to the desirability of paying special attention to the preservation of the setting of a listed building and to the desirability of preserving or enhancing the character or appearance of a conservation area. The proposal is also not in accordance with Policy LP16 (a) nor Policy LP18 of the Local Plan which states that the Council will protect,

conserve and seek opportunities to enhance the historic environment throughout Fenland. There are no public benefits which are sufficient to outweigh the less than substantial harm caused by the proposal and as such the application is contrary to paragraph 208 of the NPPF.

Residential Amenity

- 10.37 All development proposals are required to demonstrate that they will not have a negative impact upon the amenity of future residents and occupiers. Paragraph 135 (f) of the National Planning Policy Framework advises that planning decisions should result in places with a high standard of amenity for existing and future users.
- 10.38 Policy LP16 (e) of the Local Plan requires development to not adversely impact on the amenity of neighbouring users through issues such as noise, light pollution, loss of privacy and loss of light.

Occupants' amenity

- 10.39 The Nationally Described Space Standard (NDSS) is a technical standards document produced by the Government to ensure internal space within new dwellings is sufficient for future occupiers and is applicable across all tenures.
- 10.40 All of the dwellings have been designed to meet NDSS standards to provide future residents with high quality accommodation and sufficient internal amenity space. Given all of the dwellings would meet NDSS and M4(2) standards (where practical), the scheme is considered acceptable in this regard.
- 10.41 With respect to private amenity spaces, policy LP16, criteria (h) requires sufficient private amenity space, suitable to the type and amount of development proposed; for dwellings other than flats, as a guide and depending on the local character of the area, this means a minimum of a third of the plot curtilage should be set aside as private amenity space. The site plan submitted demonstrates that the third requirement can be achieved for all plots with some offering more. It is also to be noted that the site layout, save for plots 10 & 11, is identical to the site layout offered up under application F/YR21/1386/F. All of the amenity areas would also enjoy sufficient privacy, being bounded by a 1.8 metre high close boarded timber fence as demonstrated on the 'fence layout' plan submitted.

Neighbours' amenity

- 10.42 The proposed development comprises all bungalows with residential development bordering the site to the east and north. One of the previous reasons for refusal focussed on adverse impact upon residential amenity, citing the impact upon 8 & 9 The Larches in particular, whilst also referencing impact upon the future occupiers of three plots.
- 10.43 This submission sees an amended layout that reduces the number of dwellings by two with the two dwellings lost being those that were referred to in the previous reason for refusal. Further to this, plot 11 has been re-oriented and re-sited away from the eastern boundary. A pond is proposed with an element of open space to the north-east of the site along with additional landscaping to ensure any impact on amenity is reduced to a degree considered to be acceptable.
- 10.44 Nos 8 & 9 The Larches are two storey dwellings which both have primary elevations facing the application site, situated only approximately 2 metres from the boundary which contains existing 1.8m high fencing belonging to the occupiers of Nos 8 and 9. Both properties contain several habitable room windows in the elevation facing the site with no9 also benefitting from a conservatory along its southern elevation. It is to be noted that the application site is set at a slightly lower level than the neighbouring properties with the height of the existing fencing allowing for sufficient daylight and sunlight to enter the principal windows at ground floor level to both neighbouring properties as well as enabling a reasonable outlook.

- 10.45 Due to the removal of two plots from the previously refused scheme and plot 11 of the proposed plan being re-oriented, the amenity space to serve the new dwelling will be sited directly to the south and an area of open space and SuDs pond extending along the boundary to 8 and 9 The Larches. There are several mitigating factors that, on balance, render the proposal acceptable and having addressed the previous reason for refusal in respect of impact upon neighbours amenity. The amenity space proposed to plot 11 is screened from no 9 The Larches by virtue of the proposed detached garage. Further to this, there is a slight land level discrepancy in which the application site is at a slightly lower level than the neighbours with distances of between 9.1 and 9.9m retained to the boundary of the application site and the gable elevation of plot 11. These factors, coupled with the single storey nature of the dwellings proposed along with a blank eastern gable elevation to plot 11 will ensure limited overlooking and no significant loss of light to warrant refusal.
- 10.46 Additional traffic and construction traffic will (temporarily for the latter) travel past existing residences in Juniper Close and beyond in order to access the site. The proposed site is for only 14 dwellings. Given the nature and scale of the proposed development, concern has been raised from the Council's EHO surrounding noise, dust and possible vibration during the construction phase. Therefore, should the application be approved, a condition is to be imposed requesting submission of a robust Construction Environmental Management Plan (CEMP).
- 10.47 In conclusion, and as referenced above, it is considered that the amended site layout has sufficiently addressed the amenity reason for refusal of application F/YR21/1386/F. Further to this, plot 11 has been re-oriented and re-sited further away from the eastern common boundary with no 9 The Larches ensuring adequate levels of privacy for future occupiers. Through removal of two dwellings and the provision of a pond and added landscape buffering to the eastern boundary ensures there will be no perceived detrimental impact upon the neighbouring properties and therefore the application complies with policy LP16 (e) of the Local Plan.

Biodiversity

- 10.48 Paragraph 136 of the NPPF states that trees make an important contribution to the character and quality of urban environments and can also help mitigate and adapt to climate change. Paragraph 180 of the NPPF states that planning policies and decisions should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity.
- 10.49 Paragraph 186 of the NPPF states that when determining planning applications, local planning authorities should apply the following principles: a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;
- 10.50 Policy LP19 (and Policy LP16) of the Local Plan states that the Council will, in partnership with other stakeholders, conserve, enhance and promote the biodiversity and geological interest of the natural environment throughout Fenland. This will in part be achieved through the determination of planning applications which shall ensure opportunities are taken to incorporate beneficial features for biodiversity in new developments, including, where possible, the creation of new habitats that will contribute to contribute to a viable ecological network extending beyond the district.
- 10.51 The submitted application has proposed some changes to that previously refused and includes another area of open public space along with a greater number of trees to be planted. The applicant also supplemented the application with a Preliminary Ecological Appraisal, and a Biodiversity Net Gain Report. Due to original objections from County Ecology, the PEA was updated during the course of the application along with an

updated Biodiversity Net Gain Report, Metric 3.1 and Bat Report which sets out the findings of the bat surveys and proposed mitigation for loss of a bat roosts.

- 10.52 The reports set out that the impacts of the development upon the existing biodiversity have assessed using the Governments Biodiversity Net Gain calculator and the current habitats on site have been compared to those that would be provided as part of the development. The submitted report sets out that the existing site provides 6.74 units of biodiversity and the proposed development will provide 4.44 units therefore there is a loss of 2.3 units or 35% percent. Due to the current net loss on site, and the fact that there is currently no mechanism in place to buy Biodiversity Net Gain Credits, the applicants preferred method to offset the biodiversity loss is to provide a contribution of £21,000 to be made to Lattersey Nature Reserve in Whittlesey, owned by FDC, which is 13.1km away from the site. It is understood that the agent engaged with a County Council Ecologist in October 2022 and the comments received in August 2023 acknowledge this financial contribution and is recommended.
- 10.53 Whilst the principle of offsite compensation, and potentially at the suggested site, might be acceptable in principle, there is insufficient evidence to demonstrate that the amount of contribution suggested or indeed the site is suitable and provides sufficient capability to deliver the correct compensation for biodiversity loss that is required. This is something that was referred to within the previously refused scheme. However, this approach was agreed with the LPA's previous ecological advisor, subsequent to the refused application, and this has been acknowledged within the County Ecologist's comments in August 2023. The financial contribution has been referenced within the Viability Assessment and is to be secured through a Section 106 agreement should the application be approved. Details of which would be addressed at this point and any potential residual would be allocated elsewhere and as agreed.
- 10.54 The County Ecologist welcomed the additional information and updated reports which sets out the findings of the bat surveys and proposed mitigation for loss of the bat roosts. Based on this, they removed their original objection subject to the imposition of certain conditions. As such, it is considered that biodiversity enhancements can be secured on site and that suitable mitigation can be secured to ensure that no net loss to biodiversity occurs in accordance with Local Plan policy LP19.

Flooding/Drainage

- 10.55 Policy LP14 of the Local Plan is concerned with flood risk and ensuring that sites are adequately drained by Sustainable Drainage Systems (SuDS) to ensure than run off from sites is to greenfield run off rates for all previously undeveloped sites, such as this. The site lies within Flood Zone 1 which is the area at least risk of flooding and at a low risk from surface water flooding.
- 10.56 The application is accompanied by a Flood Risk Assessment/Sustainable Drainage Strategy and accompanying drainage plans. These demonstrate that the surface water from the proposed development can be managed through the use of permeable paving on all private parking and shared access areas. A detention basin is proposed in the area of open space to the north-western corner of the site.
- 10.57 Surface water from the adoptable highway, private access/parking and roof areas will be to the basin prior to discharge to the adjacent drain at the discharge rate of 2.0l/s. Any storm water will be retained to limit the discharge into the watercourse.
- 10.58 The LLFA originally raised an objection based on the diameter of the hydrobrake and the failure to demonstrate the performance of the system with climate change allowances in the 3.3% AEP calculations. Additional details were submitted and formal reconsultation took place. On the basis of the amended details, the LLFA confirmed they had no objection in principle to the proposed development and request that conditions are imposed requiring details of the surface water drainage, measures to limit surface water discharge during construction and upon completion submission of a survey of the

system, including any attenuation ponds and swales prior to adoption must be submitted for approval.

- 10.59 Several neighbouring residents have made comments concerning waterlogging of the site, water logging and flooding of adjacent gardens during periods of bad weather and issues regarding drainage of Juniper Close, the developed area to the north of this site which was constructed by the current applicant. Photos have been submitted which support the comments about standing water on the site and on neighbouring gardens. Nevertheless, this does not mean that the development of the site will cause additional issues and it doesn't determine what the cause of that standing water was. The applicant's consultants have contended that it is due to underlying clay, which would adversely affect the proper working of any soakaways at neighbouring properties, and this combined with extreme weather events will lead to this issue. The LLFA is satisfied that the proposed surface drainage strategy is acceptable subject to their suggested conditions.
- 10.60 Given the acceptance of the FRA and the drainage strategy by the LLFA, it is considered that the site is acceptable in terms of flood risk and surface drainage and could not be refused for this reason as the development will comply with policy LP14 of the Local Plan.

Highways & Access

- 10.61 Paragraph 115 of the NPPF states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
- 10.62 Policy LP15 (c) of the Local Plan requires that all development proposals provide safe, well designed and convenient access for all including promotion of non-car modes of transport.
- 10.63 The proposal provides for a mix of two and three bedroom bungalows. Appendix A of the Fenland Local Plan requires at least 2no parking spaces per dwelling which may include a garage. The proposal provides for either a double or single garage per property and two driveway parking spaces per property. Each part of the garage (each half of the double and the single garages measure approximately 2.78 metres wide internally x approximately 5.6 metres long internally. Appendix A requires the internal measurement of garages to be 7.0 metres in length x 3.0 metres wide (measured internally) for them to be counted as car parking spaces. As the proposed garages do not meet the required dimensions, they cannot be counted as parking spaces. Nevertheless, each property is provided with two spaces on driveway which are considered acceptable.
- 10.64 The site has a single point of vehicular access which is off the southern end of the recent development to the north of the site, Juniper Close. This development is accessed off Wood Street which is the sole point of access off High Street for in excess of 100 dwellings. The objectors to the scheme have pointed to the narrowness of Wood Street and issues of difficulty of vehicles being able to pass one another and safety of pedestrians.
- 10.65 The Local Highway Authority (LHA) has stated that the application for Juniper Close included some widening of Wood Street. The LHA is satisfied that the junction of Juniper Close/Wood Street is suitable to accommodate the traffic associated with the 14 dwellings proposed. With regards to the internal layout of the proposed development, the LHA requested tracking plans to demonstrate the free passage of large vehicles through the bend adjacent to plot 14. It is noted that the road layout is essentially the same as that considered previously with respect to application F/YR21/1386/F and that vehicle movements were presented as part of that application. Additional information was submitted, and the LHA were reconsulted. Further comments confirmed that the vehicular swept paths provided show vehicles passing particularly close to one another through the bend, however, whilst the track speed is not indicated, the low speeds

anticipated combined with the limited vehicle movements along the proposed cul-de-sac, it is reasonable to anticipate that drivers would be able to avoid conflict with the very infrequent movement of large vehicles, therefore no objections were raised in this regard.

- 10.66 The drainage plans have not detailed the drainage of private surfaces such as parking areas and shared driveways as may be required to prevent water entering adoptable roads as requested. This could be secured through the imposition of a condition should the application be approved.
- 10.67 In summary, whilst reservations have been raised regarding the suitability of the proposals with respect to the adoption of the roads, there is no formal objection from County Highways to the proposed development with the adoption of the estate subject to separate permission outside of planning control.
- 10.68 Although it is clear that local residents do not consider that access via Wood Street is safe and convenient, the LHA, the statutory consultee with regard to design of highways and highway safety, has raised no objections subject to imposition of conditions. Paragraph 115 of the NPPF states that development should only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road would be severe. Given the lack of objection from the LHA, there are insufficient grounds to recommend refusal for these reasons. It is therefore considered that the proposal will meet the requirements of the NPPF and policy LP15 if suitable conditions are imposed.

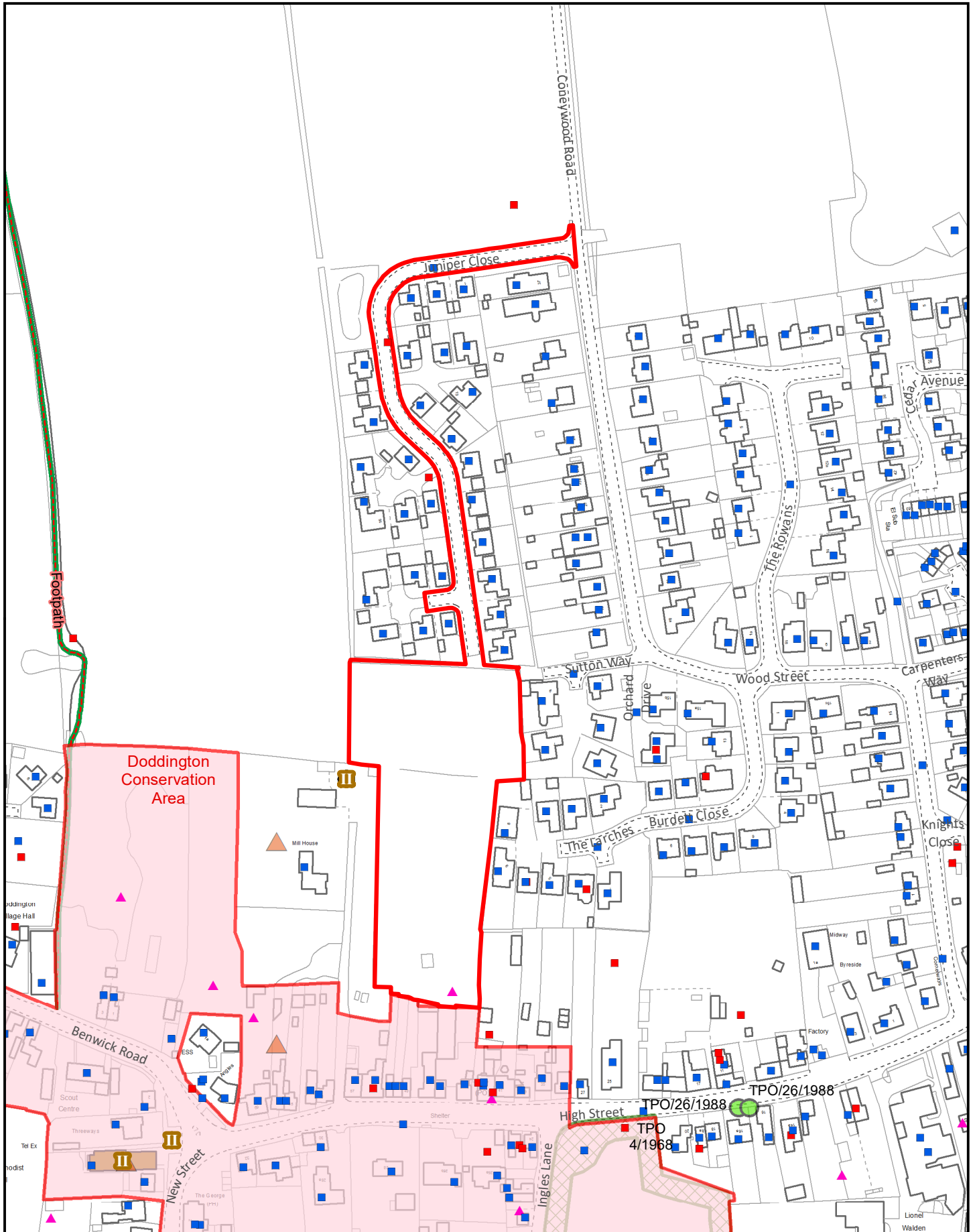
11 CONCLUSIONS

- 11.1 The scheme brought forward has addressed three of the previous reasons for refusal as referenced within the report and the applicant/agent has agreed to a Heads of Terms requiring a sum for off-site affordable housing provision along with s106 contributions. Should the application be approved, it would be subject to a s106 agreement.
- 11.2 However, paragraph 208 of the NPPF states that where a development proposal will lead to less than substantial harm of the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal. Whilst the harm has been demonstrated to be less than substantial, the requirements of the NPPF and Act require great weight to be attached to the negatives due to the harm that would arise to the setting of the Listed Building and the Conservation Area and thereby the significance of these heritage assets. In balancing the conflicting factors, taking into account the public benefits, these would not be sufficient to justify the harm to the significance of the designated heritage assets that would be caused and as such the application is contrary to paragraph 208 of the NPPF.

12 RECOMMENDATION:

Refuse; for the following reason:

1	The proposed development by reason of the loss of the open character of the site and its proximity to the adjacent Grade II Listed mill and the conservation area, fails to preserve the significance of the settings of these heritage assets. The proposal causes less than substantial harm to the setting of the heritage assets and there are insufficient public benefits to the scheme which would outweigh the harm caused. As such the proposal is contrary to policies LP16 (a) and LP18 of the Fenland Local Plan which require the preservation of heritage assets and their settings; and Section 16 of the NPPF.
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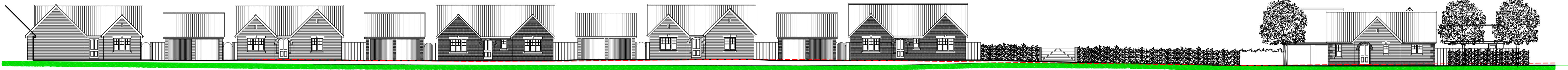
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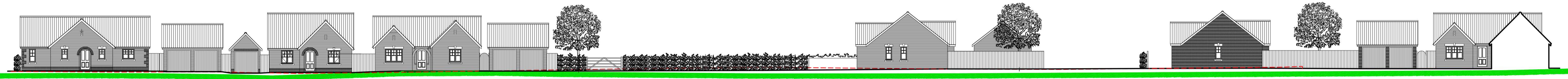


SITE PLAN 1:500

Beaver House Northern Road Sudbury Suffolk CO10 6XQ Sudbury 01787 376241		CONSTRUCT REASON LIMITED	
JOB TITLE LAND OFF JUNIPER CLOSE DODDINGTON MARCH			
DRAWING TITLE SITE LAYOUT			
REV	DATE	DETAILS	BY
A	01/06/2023	SCALE CORRECTED IN TITLE BLOCK, RED OUTLINE REMOVED, PLOT: 11 GARAGE AMENDED.	GB
SCALES 1:500		DESIGN BY DATE FEB 2023	DRAWN BY GB
DRAWING No. 2088/AD/1/201		REV A	



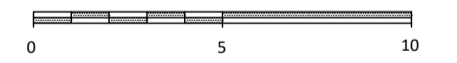
STREET SCENE ELEVATION PLOTS: 1 - 8inc LOOKING WEST



STREET SCENE ELEVATION PLOTS: 9 - 14inc LOOKING EAST

1:200 SCALE

— — — — — INDICATES ESTATE ROAD LEVEL
 — — — — — INDICATES EXISTING GROUND LEVEL



Beaver House
 Northern Road
 Sudbury
 Suffolk CO10 6XQ
 Sudbury 01787 376241



JOB TITLE
 LAND OFF JUNIPER CLOSE
 DODDINGTON
 MARCH

DRAWING TITLE
 STREET SCENE

REV	DATE	DETAILS	BY
A	08/03/2023	SCALE CORRECTED IN TITLE BLOCK	GB

SCALES	DESIGN BY	DATE
1:200	GB	FEB 2023

DRAWING No.	REV	A
2088/AD/2/211		