



Fenland District Council

FENLAND CORE STRATEGY  
DEVELOPMENT PLAN DOCUMENT  
(Proposed Submission Version)

Addendum relating to North-East March Allocation

Representation Form

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


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

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

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

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

**PART A: PERSONAL DETAILS**

Signature: 	Date: 07/08/2013
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**1. Personal Details\***

**2. Agent's Details (if applicable)**

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

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

Title	Mr
First Name	David
Last Name	Bridgwood
Job Title (where relevant)	Technical Director
Organisation (where relevant)	Wardell Armstrong LLP
Address Line 1	Sir Henry Doulton House
Line 2	Forge Lane
Line 3	Stoke-on-Trent
Post Code	ST1 5BD
Telephone Number	01782 276 700
E-mail Address	dbridgwood@wardell-armstrong.com

## PART B: REPRESENTATION

Please repeat your Name or Organisation:

Wardell Armstrong LLP

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

4. Did you submit a representation relating to the North-East March Allocation (in Policy CS9 – March)?	Yes:	✓
	No:	

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

6. Do you support the amendments to the Proposed Submission Version as set out in the Addendum relating to North-East March?	Yes:	✓
	No:	

7. With the addition of the amendments in the Addendum do you consider that the Fenland Core Strategy is legally compliant?	Yes:	✓
	No:	

8. With the addition of the amendments in the Addendum do you consider that the Fenland Core Strategy is sound?	Yes:	
	No:	✓

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

In my opinion, the Core Strategy is not:

Positively prepared: <input type="checkbox"/>	Justified: <input type="checkbox"/>	Effective: <input checked="" type="checkbox"/>	Consistent with national policy: <input checked="" type="checkbox"/>
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10. Please use the box below to set out your reasoning behind your response to Q7, Q8 and/or Q9.

See letter.

*Continue on extra sheets/expand box if necessary*

11. If you think that the Fenland Core Strategy (with Addendum) needs further changes, please set out

what you consider the change(s) should be to make it legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

See letter.

*Continue on extra sheets/expand box if necessary*

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

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

**NO**, I do not wish to participate at the oral examination:

**YES**, I wish to participate at the oral examination:

✓

13. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

See letter.

*Continue on extra sheets/expand box if necessary*

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

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

**FENLAND CORE STRATEGY  
DEVELOPMENT PLAN DOCUMENT**

**(Proposed Submission Version)**

**Addendum relating to North-East March Allocation**

**Guidance Notes on completing the  
Representation Form**

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

**By e-mail to:** [neighbourhoodstrategy@fenland.gov.uk](mailto:neighbourhoodstrategy@fenland.gov.uk)



**Please read these Guidance Notes before completing the form**

**Representations must be received no later than 5pm on Wednesday 7<sup>th</sup> August 2013**

**1. Introduction**

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

**2. Part A of the Representation Form**

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

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

### 3. Part B of the Representation Form

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

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

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

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

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

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

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

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

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

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

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<sup>1</sup> View NPPF at [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/60777/2116950.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/60777/2116950.pdf)

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

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

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

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

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

Our ref: DB/SM/ST12772/LET-005

Date: 7 August 2013

Your ref:

Neighbourhood Strategy (Planning Policy) Team

Fenland Hall

County Road

March

Cambridgeshire

PE15 8NQ

Dear Sirs

### **Fenland Core Strategy - North-East March Allocation Reconsultation**

As you are aware, on behalf of our clients, Lifecrown Group, we have made representations in respect of the Fenland Core Strategy (FCS), first in 2008, prior to the publication of the first strategy, and then in September 2011, September 2012 and April 2013. The nature of the representations we have made over that period of time has been simple and consistent; that is that the site promoted on behalf of our clients at Westry in NW March offers a highly sustainable opportunity for the development of a low-carbon mixed-use community.

I do not propose to repeat here the representations previously made to the Council in full as these will be brought to the attention of the Inspector at the appropriate time and we have made it clear that we wish to appear at the examination for that purpose. Instead, this representation will focus specifically on the matters raised by the deletion of NE March (NEM).



Wardell Armstrong is the trading name of Wardell Armstrong LLP, Registered in England No. OC307138.

Registered office: Sir Henry Doulton House, Forge Lane, Etruria, Stoke-on-Trent, ST1 5BD, United Kingdom

UK Offices: Stoke-on-Trent, Birmingham, Cardiff, Carlisle, Edinburgh, Greater Manchester, London, Newcastle upon Tyne, Penryn, Sheffield, Truro, West Bromwich. International Offices: Almaty, Moscow

ENERGY AND CLIMATE CHANGE  
ENVIRONMENT AND SUSTAINABILITY  
INFRASTRUCTURE AND UTILITIES  
LAND AND PROPERTY  
MINING AND MINERAL PROCESSING  
MINERAL ESTATES AND QUARRYING  
WASTE RESOURCE MANAGEMENT



In response to the specific questions raised in the consultation:

### **Question 8**

The reasons for our representation are specifically addressed under Question 9, below, as they relate directly to soundness.

### **Question 9**

**Effective** - The addendum to the FCS identifies doubts over the deliverability of the reallocated housing numbers from NEM. In terms of the reallocation to SW March, the addendum states “the element of doubt is probably more to do with deliverability and whether the site can come forward and deliver 500 (or more) in the plan period to 2031” (FCS Proposed Submission Addendum, p6). Furthermore, the reallocation of 250 homes to windfall numbers is also stated to be “optimistic” (FCS Proposed Submission Addendum, p6). Our client is proposing an alternative site for accommodating this reallocation, but which does not have the same concerns regarding deliverability.

**Consistent with NPPF** - The NPPF places great weight on sustainability, and indeed it is to be the golden thread running through plan-making and decision-taking. This is oft repeated because it is such a critical component of the entire Government approach to the planning system. We commented in previous representations that whilst the FCS has been modified to take into account the NPPF, we do not feel the scoring applied to our site has given sufficient consideration to its positive sustainability benefits. The replacement of the NEM allocation presents an opportunity to address this.

### **Question 11**

Currently no account of the relative energy efficiency of the various sites has been made in the assessment process, and in particular the relative performance of the various available sites. In assessing the locational characteristics of the various sites, the Council acknowledge that the Westry site is within a reasonable walking and cycling distance of the town centre. It is an easy commute. It also has good public transport links in the form of





the bus services operating on the A141 on the boundary of the site and is within an easy walk of the railway station for longer distance journeys. The locational difference between our client's site and those preferred by the Council are marginal.

Very little weight has then been applied to the sustainability benefits of the availability of sustainable energy on our site. As has been made clear, the operational anaerobic digestion (AD) plant on the site already generates electricity and heat. The energy source is food waste, and this is currently being processed on site. Electricity from the combined heat and power (CHP) units on the site is used on the adjacent vegetable packing plant, with the remainder being exported to the national grid. In the context of the proposed development electricity could be supplied to the site through a highly efficient private wire arrangement, avoiding the high transmission losses inherent in long distance electricity distribution. The heat from the plant is also capable of providing space and water heating for the proposed mixed-use development. Indeed the development mix proposed has the benefit not only of providing a very good opportunity for sustainable mixed-use development, minimizing the need to travel, but also provides a very good balance for usage of the available heat across the day and night.

We do not consider that the extent of this benefit has been fully taken into account. Ofgem (Factsheet 96) indicate that a typical medium energy consumption figure for UK Households is 16,500kwh of gas and 3,300kwh of electricity per annum. At current generating efficiencies (Carbon Trust Conversion Factors 2011 Update), that means that each household is generating 4.776 tonnes of CO<sub>2</sub> per annum. To put that into context, that is equivalent to approximately 14,000 miles in a medium size family car (Carbon Trust 2011) for every household on the site. Sufficient energy is available on the site to provide for a truly low carbon development. None of the other sites preferred by the Council offer these sustainability advantages.

There is a clear solution to the housing numbers resulting from the loss of NEM and sustainability issues with the assessment undertaken in the FCS, and that is the allocation for mixed-use development of my client's site in North West March.



### Question 13

As noted above, we recognise the importance in ensuring that the clear sustainability benefits of the site put forward by my clients are properly considered and fully understood. We therefore wish to attend the oral part of the examination in order to be able to answer questions put forward by the Inspector, but also to respond to statements and assumptions being made by the Council officers in reaching their conclusions on the sustainability and desirability of the inclusion of our client's site as a potential replacement for the North East March site.

Yours sincerely  
**for Wardell Armstrong LLP**

**D W BRIDGWOOD**  
**Technical Director**  
dbridgwood@wardell-armstrong.com

Encs

Our ref: DB/SM/ST12772/LET-005

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