



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:
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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	Tom	
Last Name	Gilbert-Wooldridge	
Job Title (where relevant)	Planning Adviser	
Organisation (where relevant)	English Heritage	
Address Line 1	24 Brooklands Avenue	
Line 2	Cambridge	
Line 3		
Post Code	CB2 8BU	
Telephone Number	01223 582775	
E-mail Address	tom.gilbert-wooldridge@english-heritage.org.uk	

PART B: REPRESENTATION

Please repeat your Name or Organisation:

Tom Gilbert-Wooldridge (English Heritage)

3. Did you submit representations on the Proposed Submission Version of the Core Strategy during the public consultation (28 th February – 10 th 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:

Justified:

Effective:

Consistent with national policy:

10. Please use the box below to set out your reasoning behind your response to Q7, Q8 and/or Q9.

We have no objection to the removal of the North-East March allocation, but have concerns regarding the knock-on impact of its removal and the need to redistribute 450 homes. Our original representation to Policy CS9 (which remains valid along with all our other representations) raised concerns with regards to development at West and South-West March in terms of impact on the historic environment and specific heritage assets. Any further development in these locations to address the removal of North-East March could exacerbate impacts.

We note that 200 homes from the North-East March allocation will be added to the South-West March allocation, while the remaining 250 homes will be found through windfall sites in March. With regards to

the latter, it is difficult to comment on the impact in the absence of specific locations, although there is the potential for additional impacts on the historic environment and specific heritage assets. With regards to the additional 200 homes for South-West March (taking the total housing for this allocation to 500 homes), there is a risk of greater impacts on heritage assets within and surrounding the site, including on-site archaeology and the setting of St Wendreda's Church. Additional housing will now need to be accommodated within this area, meaning greater land-take and/or greater density of housing. Either way, there are implications for heritage assets such as impact on views of the church or loss of archaeological features.

In our original representation, while we welcomed reference to archaeology within Policy CS9 relating to South-West March, we argued for the inclusion of wording relating to preserving views of St Wendreda's Church. Given the increase in housing numbers, the inclusion of such wording is even more important to ensure that this issue is addressed by any development proposal.

We therefore regret that the amendments to Policy CS9 as proposed by the Addendum do not include changes relating to views of St Wendreda's (both for South-West March, but also for West March; see our original representation). The Core Strategy continues to be unsound in terms of not being effective and deliverable against potential historic environment constraints, and not being consistent with national policy. Paragraph 17 of the NPPF requires plan-making to conserve heritage assets a core planning principle. Paragraph 152 requires local plans to avoid adverse impacts on the environment, using mitigation measures where impacts are unavoidable. The fifth bullet point of Paragraph 157 requires sufficient detail to be provided with site allocations.

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.

As with our original representation, in order to make the document sound, we recommend that additional wording to Policy CS9 is provided for South-West March to read:

"Views of St Wendreda's Church should be preserved."

Changes relating to West March are still required (see original representation)

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

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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 District Council

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DEVELOPMENT PLAN DOCUMENT
(Proposed Submission Version)**

Addendum relating to North-East March Allocation

**Guidance Notes on completing the
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



Please read these Guidance Notes before completing the form

Representations must be received no later than 5pm on Wednesday 7th 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 28th February and 10th 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 28th and April 10th 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)¹ (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 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)?

¹ View NPPF at https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

- 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.