

## Land West of the Avenue, March: Planning Consultation Response (F/YR21/1497/O)

To: Environment and Green Investment Committee

Meeting Date: 28<sup>th</sup> April 2022

From: Steve Cox - Executive Director, Place and Economy

Electoral division(s): March South and Rural, March North and Waldersey, Whittlesey South.

Key decision: No

Forward Plan ref: N/a

Outcome: The Committee will consider and endorse the County Council's response to the West March planning application

Recommendation: The committee is requested to: -

- a) Endorse the consultation response to the West March planning application as set out in Appendix 1; and
- b) Delegate to the Executive Director (Place and Economy) in consultation with the Chair and Vice Chair of the Committee the authority to make minor changes to the response.

### Officer contact:

Name: Colum Fitzsimons  
Post: Development and Policy Manager  
Email: [colum.fitzsimons@cambridgeshire.gov.uk](mailto:colum.fitzsimons@cambridgeshire.gov.uk)  
Tel: 07833 237194

### Member contacts:

Names: Councillor Lorna Dupre  
Post: Chair  
Email: [lorna.dupre@cambridgeshire.gov.uk](mailto:lorna.dupre@cambridgeshire.gov.uk)  
Tel: 07930 337596

Names: Councillor Nick Gay  
Post: Vice Chair  
Email: [nick.gay@cambridgeshire.gov.uk](mailto:nick.gay@cambridgeshire.gov.uk)  
Tel: 07833 580957

## 1. Background

- 1.1 Fenland District Council (FDC) has allocated land at West March in The Fenland Local Plan (2014) - under Policy LP9. This will provide for up to 2000 dwellings and is formed from several landholdings, of which the County Council is one. In July 2021, FDC approved a Broad Concept Plan (a requirement of Policy LP7 of the local plan) which sets out the parameters and guiding principles for development of the allocation.
- 1.2 Since 2019, Persimmon Homes (the applicant) have held pre-application discussions with key stakeholders to shape their emerging planning application on part of the allocation. These conversations included, but were not limited to, County Council services such as Education, Transport and Archaeology. The applicant's site does not include any land owned by the County Council.
- 1.3 In January 2022, FDC formally consulted the County Council on the submitted outline planning application (F/YR21/1497/O) for 1200 dwellings, associated infrastructure, public open space, allotments, a local centre, and a primary school. Appendix 1 sets out the technical response made by Officers in the Council's role as a statutory and non-statutory consultee. This is to inform FDC, as the local planning authority and who determine the planning application, on the various impacts of the proposed development on County Council services/infrastructure and what mitigation is required. Comments submitted are subject to endorsement by this committee.

## Main Issues

- 2.1 Set out below is a summary of the salient issues as they affect relevant County Council service areas. Further detail is set out in Appendix 1, which is the technical submission made by Officers to Fenland District Council in response to their consultation on the planning application.
- 2.2 Archaeology - The Historic Environment team have raised no objection to the development and accept most of the proposed mitigations and characterisation of the archaeological evidence amassed so far from the site. An archaeological planning condition is recommended to secure a programme of investigation and display.
- 2.3 Digital Infrastructure - BT/Openreach will be providing Broadband to the development. Further details and plans of the layout of the fibre ducting within the development will be required, in due course, before confirmation of the suitability of the broadband infrastructure can be confirmed by council officers.
- 2.4 Education – Officers have held several meetings with the applicant to establish the requirements for an on-site primary school and off-site secondary school provision. The primary school should be constructed by the Council and details of costs have been provided, to be agreed in a s106 agreement.
- 2.5 Floods and Water – As the Lead Local Flood Authority (LLFA), officers recognise that the current application supplies details for the key principles of the proposed surface water drainage strategy, which the LLFA supports in relation to the use of attenuation basins within the site and the proposed discharge rate. However, further details in respect of

surface water and surface water treatment need clarification before this aspect of the development is fully agreed and therefore an objection has been lodged. Planning conditions might be required to secure any changes needed.

- 2.6 Library and Lifelong Learning - The development will accommodate around 3000 residents who will impact the existing library service, which will require mitigation towards developing the space at March library. The S106 agreement will include measures to secure a financial contribution towards this project.
- 2.7 Public Health – several comments and recommendations have been made on transport related matters and the development and implementation of measures in the Health Impact Assessment.
- 2.8 Strategic Waste -The development will impose pressure on the existing Household Recycling Centre facility in March, to process any qualifying waste generated from this development. The County Council currently has a project underway to relocate this facility, and appropriate S106 contributions would be sought towards the additional provision required.
- 2.9 Transport - Transport officers are reviewing the transport assessment and have identified several matters for further discussion. Until these matters are resolved to the satisfaction of officers, a holding objection is in place.
- 2.10 Think Communities - Clear pedestrian links to services, informal indoor/outdoor meeting spaces and a developer contribution towards community development / youth working and Child & Family Centres is sought. Officers will progress this through the S106 negotiations.

### 3. Alignment with corporate priorities

Whilst the determination of the planning application ultimately lies with Fenland District Council, the report above sets out the implications for the Council's corporate priorities from a Cambridgeshire County Council perspective. The implications of the application for specific corporate priorities are identified below and cross referenced to the body of the report.

#### 3.1 Communities at the heart of everything we do

The report above sets out the implications for this priority in paragraph 2.10 and further detailed in Appendix 1.

#### 3.2 A good quality of life for everyone

There are no significant implications for this priority

#### 3.3 Helping our children learn, develop and live life to the full

The report above sets out the implications for this priority in paragraph 2.4 and 2.6 and as further detailed in Appendix 1.

### 3.4 Cambridgeshire: a well-connected, safe, clean, green environment

The report above sets out the implications for this priority as further detailed in Appendix 1.

### 3.5 Protecting and caring for those who need us

The report above sets out the implications for this priority in paragraph 2.7 and as further detailed in Appendix 1.

## 4. Significant Implications

### 4.1 Resource Implications

There are no significant implications within this category.

### 4.2 Procurement/Contractual/Council Contract Procedure Rules Implications

There are no significant implications within this category.

### 4.3 Statutory, Legal and Risk Implications

All contributions and obligations will be secured through the Section 106 agreement, which will be binding on the applicant and County Council and will be required to comply with Regulation 122 of the Community Infrastructure Levy Regulations 2010 (as amended).

### 4.4 Equality and Diversity Implications

There are no significant implications within this category. None of the proposals in the planning application impact on the 9 Protected Characteristics under the Equalities Act 2010. The development will provide affordable housing and local employment that will have a positive impact on addressing the Council's additional characteristic of "Deprivation".

### 4.5 Engagement and Communications Implications

There are no significant implications within this category.

### 4.6 Localism and Local Member Involvement

There are no significant implications within this category. Local members were notified about the planning application for information purposes.

### 4.7 Public Health Implications

There are no significant implications within this category.

### 4.8 Environment and Climate Change Implications on Priority Areas

There are no significant implications within this category.

#### 4.8.1 Implication 1: Energy efficient, low carbon buildings.

Neutral Status:

Explanation: the detailed building performance will be agreed through reserved matters applications and compliance with development plan policies and building regulations.

#### 4.8.2 Implication 2: Low carbon transport.

Neutral Status:

Explanation: measures to encourage travel by walking, cycling and public transport would decrease reliance on use of the private motor car.

- 4.8.3 Implication 3: Green spaces, peatland, afforestation, habitats, and land management.  
Neutral Status:  
Explanation: the development includes areas of public open space. The development must comply with requirements to achieve for biodiversity net gain.
- 4.8.4 Implication 4: Waste Management and Tackling Plastic Pollution.  
Neutral Status:  
Explanation: a planning contribution towards new capacity at March HWRC has been sought which will provide capacity for the recycling demands of this and other developments.
- 4.8.5 Implication 5: Water use, availability, and management:  
Neutral Status:  
Explanation: measures to ensure the site complies with policy requirements are being progressed.
- 4.8.6 Implication 6: Air Pollution.  
Negative Status:  
Explanation: net pollution will rise as this is a greenfield site
- 4.8.7 Implication 7: Resilience of our services and infrastructure and supporting vulnerable people to cope with climate change.  
Neutral Status:  
Explanation: Homes and buildings will be compliant with building codes in respect of environmental performance.

Have the resource implications been cleared by Finance? Yes

Name of Financial Officer: Sarah Heywood

Have the procurement/contractual/ Council Contract Procedure Rules implications been cleared by the LGSS Head of Procurement? Yes

Name of Officer: Claire Ellis

Has the impact on statutory, legal and risk implications been cleared by the Council's Monitoring Officer or LGSS Law? Yes

Name of Legal Officer: Fiona McMillan

Have the equality and diversity implications been cleared by your Service Contact? Yes

Name of Officer: Elsa Evans

Have any engagement and communication implications been cleared by Communications?  
Yes

Name of Officer: Sarah Silk

Have any localism and Local Member involvement issues been cleared by your Service Contact? Yes

Name of Officer: Emma Fitch

Have any Public Health implications been cleared by Public Health? Yes

Name of Officer: Iain Green

## 5. Source documents

### 5.1 Source documents

This report and officer assessment is based on the outline planning application as submitted to Fenland District Council.

### 5.2 Location

All plans and documents relating to this application can be viewed at [www.publicaccess.fenland.gov.uk/publicaccess](http://www.publicaccess.fenland.gov.uk/publicaccess). To access these documents as well as other relevant details please follow the instructions below:

1) Enter the full application number 'F/YR21/1497/O' on the simple search form and click Search

2) Click on the 'Documents' tab

## Appendix 1 – Submitted Technical Officer Response

### **Cambridgeshire County Council Strategic Planning Site – March West Officer Comments**

This is a technical, officer response to an outline planning application for up to 1200 homes, a primary school, and other infrastructure at land West of the Avenue (known as West March). The planning reference number is F/YR21/1497/O.

These comments are subject to endorsement by the County Council's Environment and Green Investment Committee. Due to timing, it has not been possible to approve these comments ahead of submission.

Some council services may have responded directly to Fenland District Council (FDC), and therefore some comments are replicated for completeness. This response includes responses from the following council services: - Archaeology; Digital Infrastructure, Education, Floods and Water, Library and Lifelong Learning, New Communities, Public Health, Strategic Waste and Transport Assessment.

#### Summary

Officers note this development is broadly consistent with the policies and strategies of the County Council, although there are some matters that require further consideration or detail before they are considered fully acceptable. These matters are highlighted below.

The planning application comes forward as a response to Policy L7 and L9 of the Fenland Local Plan and Broad Concept Plan. Pre-application discussions have taken place with various officers to inform the outline planning application and ensure that where-ever possible it accords with the requirements of the County Council's service needs.

Fenland District Council is the local planning authority, and these comments are intended to advise the planning officer and planning committee on the County Council's position.

Any outline planning permission issued must be subject to the signing of a S106 Agreement of which the County Council must be a party and signatory to, with the County Council's reasonable legal fees met in full by the developer.

Any financial viability matters that the development proposals have, which reduce the level of developer contributions, must be fully evidenced, justified, and noted with the County Council. This might affect the Council's proposed mitigation project.

#### Archaeology

Archaeology officers do not object to the development and can accept most of the proposed mitigations and characterisation of the archaeological evidence amassed so far from the site. Consequently, officers recommend that an archaeological condition should be attached to any consent granted to secure a programme of investigation and display. Please see below for wording of the condition. All work in Cambridgeshire is led by an archaeological brief obtainable from this office.

## ***Appraisal of the Environmental Statement and Archaeological Evaluation Report***

1. Points of detail requiring correction in the documents submitted include the Applicant's Environment Statement Vol II include:

14.41 it is stated that the District Conservation Officer will need to approve the Written Scheme of Investigation for archaeological mitigation. As this is a service our office undertakes on your behalf, we would like to advise Persimmon Homes that all matters relating to archaeology need to be discussed with and approved by us. Paragraph 14.22 expresses this.

Tables 14.2, 14.7 and others in Chapter 14, Archaeology and Heritage, incorrectly consider all non-designated heritage assets relating to buried archaeological remains to be of equal value, so that Medieval manorial remains are considered of equal, low, sensitivity to the Iron Age round house remains. This is not the case for three reasons:

- (i) There was evidence of stratified deposits in the area of the demolished, moated Hatchwood Manor and earlier, Saxon, evidence was also found in the 2012 evaluation of this site.
- (ii) Manor sites are uncommonly threatened by development and then excavated in Cambridgeshire, so that the research value of a fenland manor site raises its significance above the 'low' threshold to Medium or High. It is associated with a contemporary drainage- or enclosed field system comprising large ditches, some reused and incorporated in the 18/19<sup>th</sup> century drainage of the later arrangement of fields. Medieval roof tiles were found in the ditches
- (iii) The Magnitude of Impact shown in Table 14.4 therefore incorrectly shows 'Low' sensitivity of remains assessed as having a Magnitude of impact (of development) as 'Low adverse', and a Negligible adverse Significance of effect that results in a value 'Not significant' being ascribed to the remains.

Were it the case that the archaeology is of low sensitivity/significance/value, with particular reference to point (iii), our office might have recommended that no mitigation work would be needed and that the evaluation results had provided sufficient understanding of the assets discovered in the application area. However, this is not the case. Instead, our view is that the manorial site and its associated landscape is of regional importance (Sensitivity value = Medium to High) and that the magnitude of development effects upon its stratified remains are considered as High because the remains will be removed by the development. The Assessment Matrix in Table 14.4 would show our assessment as being Moderate or Major in magnitude, fully justifying the need for detailed excavation that has been advised. Note should be made that the Grade II Listed Hatchwoods Farmhouse is assessed as being of medium sensitivity (14.18), and in archaeological terms, the archaeological remains of the manor site are comparable, perhaps of greater sensitivity give its antiquity and vulnerability to development impact.

The correct interpretation of remains in their local and regional context is an important aspect of archaeological planning officers' appraisals as this will lead to the design of appropriate mitigation strategies that should include long term presentation and interpretation of the remains in the locality that will be affected by new development As opposed to the last point made in 14.21). This has previously been explained in planning consultation response and advice given direct to the applicant, recommending that this should be included in the Heads of Terms for the Section 106 legal agreement. Lastly on this point, the second phase of evaluation that conducted in 2020 was more comprehensive that that conducted in 2012 and afforded greater certainty of

results and the areas to be selected for mitigation works (archaeological excavation prior to development). We do not support schemes that subsequently subject all groundworks to a monitoring scheme (see 4<sup>th</sup> point in the list at 14.21) if there has been prior comprehensive evaluation, as this would downgrade the value of the evaluation scheme and be a disproportionate response to the development impacts.

2. The Archaeological Evaluation Report contains some minor errors that require amendment prior to its acceptance for inclusion in the Cambridgeshire Historic Environment Report. These will be discussed with the contractor. It is however approved as a sound evaluation of the application area.

### ***Recommendation for changes to the mitigation strategy***

Officer advice is to expand the area for excavation around the manorial site (A), to include further investigation of the 'moated intrenchments' shown on historic maps and as the purple trapezoid on Figure 14.4 of the ES. The work for this feature will be discussed with contractors, once hired, and covered in the investigation brief that we will prepare when required. This will contain the proportionately scoped mitigation areas.

While the organic remains in samples taken from a trench across the feature provided radiocarbon dates ranging around the 17<sup>th</sup>-18<sup>th</sup> century for this large landscape feature, it is hard to understand its relationship with the manor that was derelict, perhaps dismantled by that time. Perhaps it was excavated for some other purpose yet to be discovered. The late dates are best explained at this stage as indicating the latest date of backfilling of the large feature (there is much mixed 20<sup>th</sup> century rubbish of all types including tree trunks, large metal fragments and masses of barbed wire dumped in its upper fills, along with backfilled clay from a once present upcast bank), we are not yet clear as to its origins and association with the Medieval manor. More investigation to that from the evaluation trenches placed across it is required.

Small areas around the Neolithic finds and dispersed prehistoric pits need to be subject to controlled stripping and excavation since they constitute uncommon finds in the landscape and extend understanding of transhuman occupation at the western slopes of March that would later become a fen island surround by marsh.

### **Recommended Condition**

#### **Archaeology**

1. No development shall commence until the applicant, or their agents or successors in title has secured the implementation of a programme of archaeological work within the development area and in accordance with a Written Scheme of Investigation that has been submitted by the applicant and approved in writing by the Local Planning Authority. The pre-commencement aspects of archaeological work should include:

1a) Submission of a Written Scheme of Investigation that sets out the methods and timetable for the investigation of archaeological remains in the development area and includes strategies for public engagement, the local and/or museum-based display of selected evidence and the erection of interpretation boards in suitable locations in the new development, and which responds to the requirements of the Local Authority archaeology brief;

1b) Completion of mitigation fieldwork in accordance with an approved Written Scheme of Investigation.

2. The post-fieldwork sections of the archaeology programme shall be fully implemented in accordance with the timetable and provisions of the approved Written Scheme of Investigation. This stage of the programme can occur after the commencement of development:

2a) Completion of a Post-Excavation Assessment report and an Updated Project Design for the analytical work to be submitted for approval within six months of the completion of fieldwork, unless otherwise agreed in advance with the Local Planning Authority;

2b) Completion of the approved programme of analysis and production of an archive report; submission of a publication synopsis and preparation of a publication report to be completed within 18 months of the approval of the Updated Project Design, unless otherwise agreed in advance with the Local Planning Authority and to reflect the phasing of the development;

2c) Deposition of the physical archive in the Cambridgeshire Archaeological Archive Facility or another suitably accredited store approved by the Local Planning Authority, and the deposition of the digital archive with the Archaeology Data Service or another CoreTrustSeal certified repository within 1 year of completion of part 2b).

**Reason:** To secure satisfactory mitigation measures and to conserve the interest of the historic environment evidence in compliance with paragraph 199 of the NPPF.

**Informative:** *Developers will need to ensure that the timetable for the archaeology programme (including field- and all post-fieldwork stages) is included within the timetable of the development programme. Each stage of the two conditions can be discharged (partial discharge) when they have been completed to the satisfaction of the Local Planning Authority's Archaeological Advisers at Cambridgeshire County Council.*

### The Library Service

The development will accommodate around 3000 residents (1200 dwellings x 2.5 people per dwelling). This will impact the existing library service which will require mitigation towards developing the space at March library.

The library building itself is of sufficient size but will need adaptations to meet the needs of an increase in a likely younger demographic created by the development. The mitigation project will create a business and IP centre which includes working from home-style drop-in office space as well as improvements to the children's space for younger families.

Using the Council's draft S106 guidance and methodology set out by the MLA in 2010, but adapted for modern costs, a contribution of £59 per head of population increase for enhanced static library provision (resources and fit out) with no physical changes to existing building is appropriate. This will cover fit out and created space required to operate within the existing revenue of the service for management and maintenance of the enhanced offer.

Contribution requested =  $1200 \times 2.5 = 3000$  residents  $\times$  £59/pp = £177,000 or £147.50 per dwelling ( $177,000 / 1200 = 147.50$ ) and this will be confirmed in the s106 agreement.

### Digital Infrastructure

BT/Openreach will be providing Broadband to the development. Further details and plans of the layout of the fibre ducting within the development will be required, in due course, before confirmation of the suitability of the broadband infrastructure can be confirmed by council officers.

## Education

The planning application provides for an on-site primary school. The size of the primary school is agreed as 2 forms of entry (420 pupils) with the ability to expand to 3 forms of entry if required (630 pupils) which is sufficient to provide for the level of children coming forward from the development. A second primary school might be required in the wider allocation, however, that falls outside of this planning application site.

The primary school will also provide for early years provision. The primary school site is of sufficient size, being 2.3 ha for the 2 form of entry school with an additional reserve of 0.7ha of land to allow for expansion to a 3 form of entry school – if required. The broad location and shape of the primary school site is acceptable; however, it is subject to meeting the Council's approved detailed specification requirements before it is finally confirmed and accepted.

It is current CCC policy that the Local Authority will deliver new school builds and therefore an option for the developer to build the school is not compliant with current policy.

The phasing strategy and build costs have been discussed with education officers and will be finalised and related to triggers for developer contributions in the s106 legal agreement. The primary school will likely come forward in phases, due to the longer build out period of the housing, initially as a 1FE school with larger core facilities from the outset to minimise disruption at later expansions. Should the development be unable to meet the full costs of funding the primary school, a financial viability appraisal will be required to justify any amended contributions.

<b>March West Primary School 1: Costs</b>			
Phase of school build	Specification	Cost (£)	Index (BCIS)
1	1FE + 2FE Core + 1EY	7,370,880	3Q23
2	1FE + 1FE EY	4,689,204	3Q23
3 (if required)	TBC	TBC	TBC

A financial contribution towards off-site secondary school expansion will be made to mitigate this impact, with improvements to pedestrian and cycle access from the site.

## Floods and Water (summary of key points)

### **Principles for Surface Water Interception**

The current application supplies details for the key principles of the proposed surface water drainage strategy, which the LLFA supports in relation to the use of attenuation basins within the site and the proposed discharge rate.

However, within this application it is not outlined how the key principles will address on plot and individual parcel drainage, such as the requirement for interception source control. Section 6.3.7 of the Cambridgeshire Flood and Water SPD states that source control methods must be implemented across sites to provide effective pre-treatment of surface water. Interception source control can also provide the benefit of mitigation for small rainfall events, and for the first 5mm of rainfall in larger storm events. The applicant has not demonstrated that source control methods will be used on site, such as permeable paving, rain gardens or tree pits, nor have they provided

evidence of why they would be inappropriate, and therefore the LLFA is unable to support this application.

### **Surface Water Treatment**

It is mentioned within the proposals that the majority of the surface water within the site will be conveyed to and attenuated within basins located at the low points of the site. It is therefore required that individual parcels are able to provide sufficient surface water treatment before water is discharged into the wider surface water network. This is to prevent the attenuation basins being responsible for all of the surface water treatment within the site, as in the event of their failure, this would leave water to discharge from the site without any surface water treatment, creating a pollutant risk to the receiving watercourses. The use of SuDS on plot will start to form the SuDS management train, spreading the maintenance of water across multiple features. Until it is demonstrated that provision will be made for surface water treatment within individual parcels, the LLFA is unable to support this application.

### **Surface Water Flow Path**

Figure 7.3A shows a surface water flow route located in the south of the site running from the Knight's End Road and flowing north through the site, with a maximum velocity of 0.5-1.0 m/s. It is currently unclear if this surface water flow route conveys water from the houses north of Knights End Road to the existing water course, therefore having the potential to mitigate flood risk to the existing dwellings in the area. If the surface water flow route located within Parcel R1 acts to convey water from the existing dwellings, it is therefore imperative that this route is preserved within the development in order that the flood risk to the surrounding area is not increased. The LLFA therefore requires that the flow path and water conveyance routes within parcel R1 are made clear, and appropriate preservation of any conveyance ditches are included in development, for this application to be supported.

### **Public health**

The Public Health response relates to the:

- Transport Assessment,
- Travel Plan
- Volume I of the Environmental Statement
- Health Impact Assessment and
- Construction and Environmental Management Plan

### **Transport Assessment**

Paragraph 2.22 states: *"It is proposed that upgrades to PROW route 156/13 be delivered by the site whilst all other pedestrian / cycle links to The Avenue would be delivered by other development coming forward within the wider strategic LP9 allocation"* We would recommend bringing forward the upgrades to the PROW routes, in particular those providing access towards The Avenue. This will provide sustainable access to existing local cycle routes towards Neale Wade Academy and the town centre, well before the proposed two additional junior schools are occupied.

Implementing these measures in phases R1 and R2 of the 'build out' will strongly support the measures set out in the Travel Plan and is more likely to embed a culture of walking and cycling as soon as the first residents move into their new properties. This is particularly important as despite the level terrain, this area currently has one of the lowest levels of cycling and walking in Cambridgeshire

To further incentivise the use of these improved PROW's we would recommend that the welcome pack/ travel information pack for new residents, includes a local cycling map, similar in design to those already in place in Wisbech, St Neots, Ely and other towns in the county. The current Wisbech March shows links to March Station (2.4 miles away from Knights End Rd), but not further into March itself.

In line best practice elsewhere, we would request that the developer should consider funding the production of a March cycle map. This has been successfully introduced as part of new residential schemes in other parts of UK, including the Doncaster Travel Smart programme. This has led to improved engagement with the existing local communities whilst increasing active travel.

Paragraph 2.33 refers to "a developer contribution to provide a high-quality bus service to enhance site accessibility for up to 8 years. It is envisioned that the service will deliver a half-hour frequency, providing direct connectivity to March town centre, Peterborough and Ely"

A good example of best practice in high quality bus services is route 36 serving Ripon in North Yorkshire, a town with a similar, population to March.

<https://www.transdevbus.co.uk/harrogate/services/HDT/36> In contrast to national bus ridership, passenger numbers on this service continues to grow with increasing journeys for employment and education in particular. Potentially, there is an opportunity to replicate this success and provide improved access local communities in March. With this in mind we believe the developer should consider improving the overall frequency of services from the development at peak times. Evidence suggests that providing 20 mins service into March town centre along with measures to improve the public transport links to the rail station, would considerably improve access to employment both within the town and across the county supporting local economic growth.

The reference in Paragraph 2.37 relating to the possibility of using alternative fuelled buses used for the services: "the use of Alternative fuel technologies will be examined to minimise potential greenhouse gas emissions from the service" is to be welcomed and complements the Bus Improvement Plans commissioned for Dft in autumn 2021.

With the significant increase of Electric vehicle sales across the UK in the last 12 months that the statement relating to the installation of residential charging points" provided at an appropriate level" in 2.65 requires further clarification at the reserve matters stage.

## **Road Safety**

Paragraph 4.2.1 states "In any case, the number of 'serious' incidents represent a negligible proportion of the total quantum. It is therefore considered that the proposed development will have no adverse impact on highway safety". Despite this, we would welcome developer support for local positive road safety campaigns, aimed at reducing parental cycling safety concern would be well received by the town's residents. This would also raise awareness of road safety issues, particularly amongst those new residents unfamiliar to driving in the local area.

## Travel Plan

The Travel Plan includes a useful action plan, however, as the construction process is to last 13 years, we would suggest that the statement in paragraph 5.5 relating to collection of base travel data should be revised. "Within 6 months of 50% occupation, the baseline mode split will be revised. The emphasis, however, will remain to reduce the dependence on single occupancy vehicular travel and target a shift towards alternative sustainable travel options"

We would recommend the inclusion of an additional interim survey as phase R3 construction commences.

## Environmental Statement Volume 1

### Air Quality

Despite baseline air quality not exceeding current air quality objectives (Chapter 7.2/ 7.3) we would recommend further mitigation measures during the Construction process.

These should include stipulating a minimum Euro VI standard for all HGVs for all contractor's/ sub-contractors and the use of low emission NRMM's on site. Even though emission levels may remain below the current objectives, any increase in particulates will impact on health consequently minimising impact on air quality is essential for both the new residents and the existing population of the town of March.

## HIA Appendix 15.1

The use of HUDU toolkit is appropriate. However, we strongly recommend revising the HIA at each of the reserved matter stages of the development to address many of the areas categorised by the submitted HIA as "uncertain." These issues clearly require more detailed consideration before final approval is considered.

Long term stewardship of community assets set out in the HIA section 6.5 from green space, active trail, sport facilities, Multi use Games facilities etc, should be – free at the point of use or alternatively funded through a scheme established by the developer that is designed to subsidise the facilities for low-income families. This is particularly important in the area in and around March as it will contribute to improved the health and wellbeing across the community.

Table 6.4 of the HIA States "*Overall, predicted changes in air quality during operation would not be sufficient to quantify any measurable adverse change in health outcomes across the local population.*" However as previously mentioned in the response to the air quality section of the Environmental Statement above we would recommend a minimum requirement of EURO VI for all road vehicles delivering to site throughout all the phases of construction, along with the introduction of an on-site anti-idling agreement.

In respect of the proposed Community buildings, we would strongly suggest that the facilities on site referred to in Table 6.2 should be constructed and ready for used as the initial residents for phase R1 & R2 move on to site.

We would also recommend the recruitment of a Community Development worker, as part of the development prior to first occupation. Potentiality funded through section 106 funding, the worker

would support the new on-site facilities, encourage health lifestyles and provide a link with the existing community.

## **Construction and Environmental Management Plan**

The commitment by the applicant to minimise idling of vehicle on site is welcomed. However, it would recommend the inclusion with the Method statement for contractors and sub-contractors a further condition to only allow EUROVI vehicles on site and for deliveries.

The location of the compound for each 'build out' relative to the existing properties needs further clarifications minimising noise, dust and disturbance to the existing residents.

## **Reserved matters**

Many details aspects of the development have implications for health and should be addressed as part of a "Statement of Compliance" submitted for approval with each reserve matters stage of the application

## **Impact on GP practices and Pharmacies**

The assessment on Health Care provision set out in the HIA will need to be discussed with the Cambridgeshire and Peterborough Clinical Commissioning Group (CCG) to reflect the current needs and the impact of over 2000 new residents on the local health providers.

## **Strategic Waste**

The development will impose pressure on the existing Household Recycling Centre facility at March, to process the waste generated from this development. The Council currently has a project underway to relocate this facility, an appropriate S106 contributions would be sought towards the additional provision required.

With regard to waste requirements providing space on plots for refuse, recycling and cycle storage, these storage areas must be easily accessible for refuse collections vehicles to empty the bins and the Council's RECAP waste partnership have a design guide which should be considered in the final designs for the layout.

## **Transport**

Transport officers are reviewing the transport assessment and have identified several matters for further discussion. Until these matters are resolved to the satisfaction of officers, a holding objection is in place.

## **Thinkcommunities**

Clear pedestrian links to services, informal indoor/outdoor meeting spaces and a developer contribution to community development / youth working may be required, as well as to Child & Family Centres. Officers would like to progress this discussion with the applicant.

11<sup>th</sup> February 2022.

V1.0