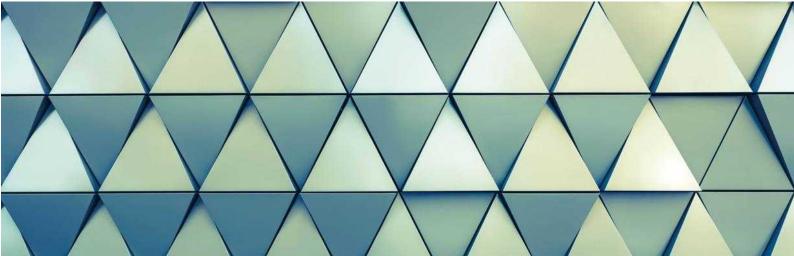
# Mepal Outdoor Centre, Mepal, CB6 2AY

**Planning Statement** 

on behalf of East Cambs Trading Co Ltd. August 2021



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# Appendices

Appendix 1: Screening Request
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Appendix 4: Alternative Site Assessment

# **1.0 Introduction**

1.1 This Planning Statement has been prepared on behalf of East Cambs Trading Co Ltd. "the Applicant" in support of a detailed planning application submitted to East Cambridgeshire District Council ECDC as the Local Planning Authority LPA for the following development:

> "Construction of a crematorium and associated service and administration building, function building, memorial garden, natural burial areas, pet cemetery, car parking, new vehicular access from the A142 north of the site and landscaping" "the Proposed Development".

At

Former Mepal Outdoor Centre, Chatteris Road, Mepal, Ely, Cambridgeshire CB6 2AZ "the Site"

#### **Application Documentation**

- 1.2 The planning application documentation submitted for approval comprises the following:
  - Completed application form, certificates and notices under Articles 11 and 12 of the Town and Country Planning Development Management Procedure England Order 2010.
  - Community Infrastructure Levy Form 1: CIL Additional Information.
  - A full set of drawings prepared by Benchmark Architects.
- 1.3 This documentation should be read in conjunction with a range of supporting material as follows:

Document	Prepared By	Date
Planning Statement	Nexus Planning	August 2021
Alternative Site Assessment	Nexus Planning	August 2021
Sequential Test	Nexus Planning	August 2021
Design and Access Statement	Benchmark Architects	June 2021
Design Statement	CDS	June 2021
Preliminary Ecological Appraisal	Syntegra Consulting	July 2021

Wintering Bird Survey Report	Syntegra Consulting	February 2020
Water Vole and Otter Report	Syntegra Consulting	July 2021
Dusk Activity Survey Report	Syntegra Consulting	July 2021
Botanical Survey Report	Syntegra Consulting	July 2021
Terrestrial Invertebrate Survey Report	Syntegra Consulting	July 2021
Drainage Strategy Report	CDS	June 2021
Landscape and Visual Impact Assessment	CDS	June 2021
Landscape Management Plan	CDS	June 2021
Noise Impact Assessment	Cass Allen Associates	November 2020
Geoenvironmental and Geotechnical Assessment	CDS	June 2021
Flood Risk Assessment	CDS	June 2021
Drainage Strategy Report	CDS	June 2021
Transport Assessment	Alpha Consultants	August 2021
Road Safety Audit	BN&A	June 2021
Tree Survey	RGS Arboricultural Consultants	April 2020
Utilities Plan	CDS	March 2020
Ventilation Extractions details	Tauw	October 2019
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Table 1.1: Application Documents

#### **Structure of the Report**

1.4 This Planning Statement comprises the following sections and should be read in conjunction with the above accompanying technical reports, submitted drawings and application forms:

Section 2 provides details on the site location and the surrounding area

Section 3 outlines the relevant planning history of the site

Section 4 describes the proposed development

Section 5 outlines the planning policy context

Section 6 assesses the proposed development against relevant planning policies

Section 7 provides an overall summary and conclusion

#### **Environmental Impact Assessment**

- 1.5 The formal Screening Opinion of ECDC was sought by letter dated 17<sup>th</sup> May 2021 **Appendix 1** in connection with development at the site comprising a crematorium with associated facilities.
- 1.6 The Formal Screening Opinion of ECDC dated 9<sup>th</sup> August 2021 **Appendix 2** sets out that whilst the proposal constitutes Schedule 2 development the specific impacts of the development are not considered to result in significant effects on the environment. As such, anEnvironmental Impact Assessment is not considered required.

## 2.0 Site Context

- 2.1 The Site measures approximately 13.5 hectares in area and is located to the western side of the A142 in East Cambridgeshire. Situated in open countryside, the closest settlement is Mepal, circa 3km away from the Site to the south along the A142 with the larger settlement of Chatteris slightly further away from the Site to the north.
- 2.2 The land was historically used an aggregate quarry, but was later converted for use as an outdoor activity centre for activities including archery, rock climbing, sailing and canoeing amongst others. In that regard, a large proportion of the Site to the north and west now contains a lake. The south eastern area includes a cluster of buildings of different scales and design, all associated with the outdoor centre. This area also contains a fairly large surface level car park with a single means of vehicular access from the A142.
- 2.3 The "Pretoria Energy" anaerobic digestion plant directly adjoins the Site to the north. Land to the east of the A412 is still in use for the quarrying of aggregates whilst surrounding land is in active agricultural use.
- 2.4 It is understood that use of the Site itself as an outdoor activity centre was not financially viable and as such, it has been vacant for a number of years.
- 2.5 In terms of constraints, Environment Agency mapping shows that Site is in an area that benefits from flood defences. The Site is in also in close proximity to several designated wildlife sites including the Ouse Washes Site of Special Scientific Interest.
- 2.6 The Policies Map for East Cambridgeshire suggests that the Site is within a Minerals Consultation Area and a Waste Consultation Area. It is however otherwise largely unconstrained.

# **3.0 Planning History**

3.1 The Site, whilst currently vacant, has an authorised use as a centre for outdoor sports and recreation.That use dates back to the 1980's, but planning history of relevance is set out in more detail below:

Reference	Description of Development	Decision / Date
04/01333/FUL	Log cabin to provide staff accommodation from March to September	Approved
94/00758/FUL	Erection of multi-activity area 422 sq.m , boatstore 54.76 sq.m , jetty, toilet-block 67.8 sq.m , 12m diameter umbrella and alterations to main building, access and car park	Approved
93/00783/FUL	Roof structure over play area	Approved
92/00455/FUL	Canoe Store	Approved
84/00473/FUL	Facilities for outdoor centre	Approved
83/00466/FUL	Outdoor recreational facilities	Approved
80/00571/FUL	Erection of hut for shelter of lifeguards, first aid and storage of equipment	Approved

- 3.2 Other applications at the site relate largely to maintenance operations.
- 3.3 The anaerobic digester plant to the north of the Site was approved in 2015 as follows:
  - 14/00204/FUM Erection of anaerobic digester plant with maize clamps, involving construction of a new access and formation of a surface water reservoir at land east of greys farm – Approved 13th August 2015.



### 4.0 The Proposed Development

- 4.1 The Proposed Development would provide a new crematorium for East Cambridgeshire District. The application proposals will further involve the following:
  - Construction of a combined crematorium, main chapel, and side chapel;
  - Reception Building;
  - A modular function building;
  - Pet Cemetery;
  - Memorial walls;
  - Natural burial area;
  - Car parking and improvement of existing site access;
- 4.2 The proposed crematorium building would accommodate a flexible multi-faith hall for up to 125 people. It would be linked to an ancillary structure accommodating staff at the Site whilst a separate structure would provide function space and toilet facilities. The main buildings would be connected by a series of flat roofed links and a covered external canopy to the front of the main service hall.
- 4.3 More generally, the Proposed Development would comprise:

#### Burial and Internment

- 294 natural burials
- 290 in-ground ash internment
- 120 pet burial
- provision for ash scattering

#### Parking

- 67 standard, main car park of which 6 in staff area & 16 electric charging
- 30 standard overflow / natural burial area
- 6 standard staff parking
- 20 disabled 11 main car park, 4 natural burial/overflow, 3 multi-function building, 2 staff
- 5 hearse / limousine parking areas 3 near cemetery and 2 near natural burial area
- 3 mini-bus parking area

• 6 spaces including 1 disabled space north of the Site with separate means of access from the A142.

#### <u>Access</u>

- 4.4 The Site benefits from a means of vehicular access directly from the A142 on its western side, leading to a large surface level car park. The Proposed Development would see that access retained in its current form as the principal point of vehicular access to the Site serving the crematorium and associated facilities.
- 4.5 Of note, the proposal would introduce a secondary means of vehicular access from the A142 to the north of the Site. This access would be created by upgrading an existing, but disused, vehicular access in the same location and would lead to a car park for 6 cars. It is proposed that this access point would facilitate shared recreational use of the Site which is segregated from the main crematorium use. Proposed activities would include bird watching, walking and fishing.

# 5.0 Planning Policy Context

- 5.1 Section 38 6 of the Planning and Compulsory Purchase Act 2004 requires that, where regard is to be had to the statutory development plan in determining an application for planning permission, the determination shall be made in accordance with the development plan, when read as a whole, unless material considerations indicate otherwise. The Development Plan for East Cambridgeshire Comprises:
  - the East Cambridgeshire Local Plan 2015 "ECLP"
- 5.2 Other material considerations in this context include:
  - National Planning Policy Framework 2019;
  - National Planning Policy Guidance;
  - East Cambridgeshire Supplementary Planning Documents:
    - Design Guide SPD 2012 ;
    - Developer Contributions SPD 2013 ;
    - Renewable Energy Commercial Scale SPD 2014;
    - Contaminated Land SPD 2015 ;
    - Cambridgeshire Flood and Water SPD 2016 ; and
    - Draft Natural Environment SPD 2020.

#### **Emerging Plans**

- 5.3 The Framework at Paragraph 48 is clear that Local planning authorities may give weight to relevant policies in an emerging plan according to its stage of preparation with more advanced plans attracting greater weight, as well as the extent of unresolved objections and the degree of consistency with polices in the Framework.
- 5.4 In that regard, the Council had been preparing a replacement Local Plan for East Cambridgeshire. The Local Plan was submitted to the Secretary of State for examination in February 2018. The examination duly took place in June and September 2018 with the Inspector concluding that the Plan

could be found sound subject to modifications. However, at a Council meeting of 21st February 2020, the Council resolved to withdraw the Local Plan Review.

#### **Development Plan**

#### The East Cambridgeshire Local Plan 2015

- 5.5 The ECLP was published in 2015 and sets out the vision, objectives spatial strategy and policies to deliver the planned growth for the District to 2031.
- 5.6 Regulation 10A of the Town and Country Planning Local Planning England Regulations 2012 as amended states that local planning authorities must complete a review of a local plan every five years, starting from the date of the adoption of the local plan. The Council carried out this exercise "the Second Review" in April 2020, where it concluded that overall the development plan remains up to date.
- 5.7 The following policies of the ECLP are considered to be of relevance:
  - Growth 2 Locational Strategy;
  - Growth 3 Infrastructure requirements;
  - Growth 5 Presumption in favour of sustainable development;
  - EMP3: New employment development in the Countryside;
  - EMP4: Re-use and replacement of existing buildings in the countryside;
  - ENV1: Landscape and settlement character;
  - ENV2: Design;
  - ENV4: Energy efficiency and renewable energy in construction;
  - ENV7: Biodiversity and geology;
  - ENV8: Flood risk;
  - ENV9: Pollution;
  - ENV14: Sites of archaeological interest;
  - COM3: Retaining community facilities;

- COM4: New community facilities;
- COM7: Transport Impact;
- COM8: Parking Provision.

#### **Other Material Considerations**

#### The National Planning Policy Framework 2019

- 5.8 The amended National Planning Policy Framework "the Framework" was published in February 2019 and sets out the Government's planning policies and how these are expected to be applied. It confirms that applications for planning permission should be determined in accordance with the Development Plan for an area unless material considerations indicate otherwise. It further establishes that the Framework must be taken into account in the preparation of Local Plans and is a material consideration in planning decisions.
- 5.9 Paragraph 11 in particular states that plans and decisions should apply a presumption in favour of sustainable development. For decision taking, this means:

"approving development proposals that accord with an up-to-date development plan without delay".

#### National Planning Practice Guidance

- 5.10 On 6th March 2014, the Department for Communities and Local Government launched its National Planning Practice Guidance NPPG web based resource. The NPPG is a live document that will be actively managed as necessary to ensure that it remains up to date but it contains a number of elements that are relevant to the determination of this application.
- 5.11 Notably under the heading "How are well-designed places achieved through the planning system " it states that well-designed places can be achieved by taking a proactive and collaborative approach to all stages of the planning process. Where the design of a development accords with clear expectations in plan policies, design should not be used by the decision-maker as a valid reason to object to development.

#### ECDC Supplementary Planning Documents

- 5.12 Relevant Supplementary Planning Documents for East Cambridgeshire include:
  - Cambridgeshire Landscape Guidelines 1991 continues to form the most up-to-date baseline assessment of landscape character in Cambridgeshire.
  - Design Guide SPD 2012 sets out two broad aims, firstly setting out prescribed rules that should be adhered to and secondly focussing attention on design issues to be assessed when determining applications.
  - Developer Contributions SPD 2013 sets out the approach by ECDC in seeking developer contributions for infrastructure and environmental improvements.
  - Contaminated Land SPD 2015 provides guidance regarding the information required by the Council in assessing applications for planning consent on land that may be affected by contamination.
  - Cambridgeshire Flood and Water SPD 2016 prepared in conjunction with Cambridgeshire County Council as the Lead Local Flood Authority and other LPA's within Cambridgeshire, to support the implementation of flood risk and water related policies in Local Plans.
  - Natural Environment SPD 2020 provides advice on policy requirements relating to the natural environment, including issues such as net gain in biodiversity.

### 6.0 Assessment of the Proposed Development

- 6.1 This section sets out the main planning issues associated with the Proposed Development and provides an explanation of how those issues are addressed in order to comply with the aims, objectives and requirements of the policies of the Development Plan, taking into account other material considerations. Based primarily on the topics identified in the Framework, we consider the key matters relevant to the assessment of the proposed development are as follows:
  - i. Principle of development;
  - ii. Promoting sustainable transport;
  - iii. Achieving well-designed places;
  - iv. Meeting the challenge of climate change, flooding and coastal change; and
  - v. conserving and enhancing the natural environment.

#### 6.2 Those topics are discussed below.

- i. Principle of development
- 6.3 ECLP Policy COM3 relates to the retention of community facilities and proposals leading to the loss of a commercial community facility. It makes it clear that such proposals would only be permitted if:
  - It can be demonstrated that the current use or an alternative community use is not financially viable and that all reasonable efforts have been made to sell or let the property for community purposes at a realistic price for at least twelve months; or
  - Development would involve the provision of an equivalent or better replacement community facility either on-site or in an appropriately accessible alternative location ; or
  - Development would involve the provision of an alternative community facility which brings demonstrable greater benefits to the settlement or neighbourhood -except in the case of open space, sports and recreational facilities which should be retained where possible in accordance with paragraph 74 of the National Planning Policy Framework."

- 6.4 Policy COM4 permits new community facilities in the countryside in exceptional circumstances if it can be demonstrated that either there is a lack of suitable and available land within settlements; or a rural location is required.
- 6.5 It goes on to make it clear that proposals for all new or improved community facilities should:
  - Be well located and accessible to its catchment population including by foot and cycle.
  - Not have a significant adverse impact itself or cumulatively in terms of the scale or nature of traffic generated.
  - Not have a significant adverse impact on the character of the locality, or the amenity of nearby properties.
  - Demonstrate that opportunities to maximise shared use have been explored and
  - Be designed to facilitate future adaptation for alternative community uses or shared use.
- 6.6 Policy EMP4 of the ECLP deals with the re-use and replacement of buildings in the countryside specifically for business, tourism, outdoor recreation or community-related uses. It details that the replacement of existing buildings in the countryside for such uses as clarified by supporting paragraph 5.5.4 of the ECLP will only be permitted where it would result in *"a more acceptable and sustainable development than would be achieved through conversion"* and where the following bullet points are adhered to:
  - It can be demonstrated that the building is of permanent and substantial construction.
  - The form, bulk and design of the building is of visual merit, architectural merit or historical significance, and is in general keeping with its surroundings.
  - The proposal does not harm the character and appearance of the building or the locality
  - The proposal would not by itself or cumulatively have a significant adverse impact in terms of the amount or nature of traffic generated; and
  - Other Local Plan policies relating to specific uses are met.

6.7 Paragraph 96 of the Framework outlines, amongst other things, that existing open space, sports and recreational buildings and land should not be built on unless one of more of the listed criteria are met, including where:

'a an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements"

- 6.8 As set out above, the Site comprises the existing, but vacant, "Mepal Outdoor Centre". As such it has an established use as a centre for predominantly outdoors sports and other forms of recreation. That recreational use dates back to the 1980's and it is understood to have continued until 2012 when financial difficulties forced the trustees of the centre to close the premises. A joint venture with an Ely based charity "Cambridgeshire Acre" saw it reopen in 2013 however, the centre was closed permanently following theft and an arson attack in 2016. It is now in a state of disrepair and has remained vacant since that time.
- 6.9 It is noted that the Glossary to the ECLP describes "Community Services and Facilities" as follows:

"Includes open space, <u>sport and recreational facilities</u>, affordable housing, education, health, public transport services and cultural services" emphasis added .

- 6.10 The authorised use is therefore considered to constitute a community facility for the purposes of this assessment.
- 6.11 The proposal would see the Site redeveloped to form a crematorium with associated structures and facilities including memorial garden, natural burial areas, pet cemetery, car parking and landscaping. The supporting text under Chapter 7 of the ECLP outlines that they will include, amongst other things, places of worship which in turn could include burial facilities. It is clear that none of the lists provided, nor the glossary definition, seek to give exhaustive examples and in that respect are consistent with the Framework at Paragraph 92 a which outlines a list of examples which are broadly similar. Having regard to that, it is our view that the proposed crematoria would also constitute a community facility for the following reasons:
  - It would share some of the characteristics exhibited by places of worship; and
  - The examples given include facilities that provide for the health, welfare, social, educational, spiritual, recreational, leisure and cultural needs of a community. The

service provided by the proposal in this case would meet an important social need.

6.12 The proposal would thus provide replacement community facilities and the provisions of Policy Com3 apply.

#### Compliance with Policy COM3

- i Viability
- 6.13 In order to comply with Policy COM3 of the ECLP, only one of the three criteria outlined must be met. The first bullet point outlines that the loss of community facilities will be acceptable where the current or alternative use is not financially viable.
- 6.14 In that regard, it is worth reiterating that the Mepal Outdoor Centre first closed in 2012 amid financial difficulties and again in 2016 when theft and arson meant it simply was not financially viable to continue. Extensive attempts have been made by East Cambridgeshire District Council to re-let the site for alternative recreation use since that time. The summary note included at **Appendix 2** provides more detail, but of note initial expressions of interest were sought by the Local Authority resulting in ten responses and a shortlist of five potential occupiers. Negotiations continued with the preferred bidder, an operator of visitor attractions, but they ultimately failed to provide their terms for the project and disposal of the Site. As a consequence, the Site has remained vacant since 2016.
- 6.15 Given the widely acknowledged financial issues associated with the current use of the Site and alternative community uses, it is considered that the first bullet point under ECLP Policy COM3 is complied with.

#### ii Replacement Facility

- 6.16 The second bullet point to COM3 refers to replacement community facilities. It is assumed that the second bullet point is directed at proposals which include the same type of facilities as already exist at the Site. As such, it is not considered to be of relevance in this case.
  - iii Alternative Facilities
- 6.17 The third bullet point is considered to be of relevance to the proposal, outlining that the loss of sports or recreation facilities requires consideration of the Framework at Paragraph 74 now Paragraph 97.

6.18 In turn, the Framework at Paragraph 97 outlines that amongst other things, such facilities should not be built on unless they are shown to be surplus to requirements. As set out above, the existing facilities have been closed for a number of years and attempts to re-open the Site as an activity centre have failed. It has thus been shown that the facilities are surplus to requirements and as a consequence, the requirements of the Framework and Policy COM 3 are complied with.

#### Compliance with Policy COM4

- 6.19 Policy COM4 permits new community facilities in the countryside in exceptional circumstances if it can be demonstrated that either:
  - There is a lack of suitable and available land within settlements; or
  - a rural location is required.

#### Alternative Site Assessment

- 6.20 The application is accompanied by an Alternative Site Assessment ASA at **Appendix 4** which specifically determines whether suitable and available land that could accommodate the Proposed Development exists within settlements. It does that by identifying a suitable search area and the settlements within that area, determined at least in part by the catchment for the proposed crematorium. That search area covers settlements within East Cambridgeshire District as well as the adjoining authority of Fenland. Specifically, available land has been established using the following sources:
  - the East Cambridgeshire District Council Call for Sites Report May 2016 and
  - Fenland District Council Strategic Housing & Economic Land Availability Assessment February 2020
- 6.21 The ASA goes on to assess land available within the urban areas against a series of characteristics and criteria which all sites must possess in order to accommodate the Proposed Development. Amongst others that includes a minimum site area of 2ha, a minimum distance of 200 yards from adjoining neighbouring properties, the need for a tranquil setting and reasonable access by public transport.
- 6.22 Against those criteria, it concludes that there are <u>no</u> available sites within the urban which are capable of accommodating the Proposed Development.

#### Need for a Rural Location

- 6.23 It should be noted that if the first bullet point can be overcome, there is no need to address the second bullet point however for completeness, it is demonstrably the case that crematoria require a rural location as per Section 5 of the Cremation Act 1902 which states that no crematorium shall be constructed nearer to any dwelling-house than two hundred yards. Furthermore, the Department of Environment publication 'The Siting and Planning of Crematoria 1978 ' states that suitable sites should extend from 2 to 4 hectares and be in a suitable surrounding to enable mourners to have benefit of suitably quiet and peaceful surroundings. This generally means that crematoria will need to be sited beyond settlement boundaries within the countryside.
- 6.24 Given the above, we consider that there is a demonstrable need for the Proposed Development to be situated within a rural location. The locational requirements of COM4 are therefore also complied with.

#### Other Requirements

- 6.25 Clearly the thrust of Policy COM4 in so far as it relates to the principle of development is complied with. The Policy also outlines a series other more detailed requirements for all new or improved community facilities. Those points are responded to in more detail elsewhere in this Planning Statement but are summarised below for reference:
  - Be well located and accessible to its catchment population (including by foot and cycle) the Site in this case is centrally located within the catchment area between the major settlements of Mepal and Chatteris. It is also within easy reach of nearby Ely via the A142, the primary arterial route within this part of East Cambridgeshire.

The Site is accessible by bus with a dedicated stop on the A142 serving the Outdoor Centre. The Site is accessible by bicycle via the A142 albeit in accordance with comments from the County Highway Authority, that route method is not encouraged. Whilst walking is not a viable option it would equally not be a viable option for the approved use as an activity centre. In any event, the use as a crematorium means that the majority of visitors will opt to travel by private car.

• Not have a significant adverse impact (itself or cumulatively) in terms of the scale or nature of traffic generated – transport impacts are discussed in more detail later in this Planning Statement and within the accompanying Transport Statement. However, it is concluded that the Proposed Development would not have a severe impact on the highway network in terms of the scale or nature of traffic generated.

- Not have a significant adverse impact on the character of the locality, or the amenity of nearby properties – the proposal is sympathetic to the surrounding landscape by virtue of its scale, design and location whilst it is situated a considerable distance from all neighbouring residential properties and would have no adverse impact on neighbouring residential amenity.
- Demonstrate that opportunities to maximise shared use have been explored as set out above, the proposal in this case would upgrade an existing means of vehicular access to the north of the Site to facilitate shared recreational use. Specifically, this arrangement would facilitate activities such as fishing and walking in a way which is separate from the main crematorium use. It is therefore considered that opportunities to maximise shared use have been fully explored.
- Be designed to facilitate future adaptation for alternative community uses or shared use - the very specific nature of the proposed use and facilities means that future adaptation in this case is not a realistic proposition.

#### Compliance with Policy EMP4

- 6.26 Policy EMP4 gives support to the re-use of existing buildings in the countryside where the proposal involves a change to community-related uses. It is however silent with regard to <u>replacement</u> buildings in the countryside where the replacement involves a change to community related uses as proposed in this case. It is therefore not considered that the policy provides any direct control in respect of the Proposal.
- 6.27 Even so, it is clearly the case that the replacement structures would result in a more acceptable and sustainable form of development than could be achieved through conversion. Furthermore, the various other policy requirements are also complied with. Specifically, the Proposed Development would not harm the character and appearance of the building or the locality, nor would it have a significant adverse impact either alone or cumulatively in terms of the amount or nature of traffic generated.

#### Need for the Proposed Development

6.28 As set out above, the Proposed Development complies fully with Policies COM3, COM4 and EMP4 of the ECLP. Fundamentally, compliance with those policies does not rely upon establishing a need for the Proposed Development. Nonetheless, the Applicant is satisfied that sufficient need exists within the catchment area for the Proposed Development to constitute a viable and ongoing commercial operation.

#### Conclusion on Principle of Development

6.29 Having regard to the above it is clear that both the existing and the proposed uses would constitute "community facilities" for the purposes of local policy. That specifically brings into play ECLP policies COM3, COM4 and EMP4 which deal with loss and replacement of community facilities respectively. The assessment above outlines that the Proposed Development in this case would comply fully with those requirements and the proposal is therefore considered to be acceptable as a matter of principle.

#### ii. Promoting Sustainable Development

- 6.30 The Framework sets out at Paragraph 102 that transport issues should be considered from the earliest stages of development proposals so that impacts can be addressed. In considering development proposals, it should be ensured that:
  - Appropriate opportunities to promote sustainable transport modes can be, or have been, taken up;
  - Safe and suitable access to the site can be achieved for all users;
  - Any significant impacts from the development on the transport network or on highway safety can be mitigated.
- 6.31 Paragraph 108 of the Framework outlines that in assessing development proposals, it should be ensured that appropriate opportunities to promote sustainable transport modes have been taken up, safe and suitable access to the site can be achieved for all users and any significant impacts can be cost effectively mitigated.

- 6.32 Paragraph 109 outlines 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.
- 6.33 Policy COM7 of the ECDC outlines the development should be designed to reduce the need to travel, particularly by car, and should promote sustainable forms of transport appropriate to its particular location.
- 6.34 Policy COM8 is clear that development proposals should provide adequate levels of car and cycle parking and make provision for parking broadly in accordance with the Council's parking standards. It goes on to state that in appropriate circumstances, parking standards may be relaxed in order to reflect accessibility by non-car modes.
- 6.35 Policy COM4 outlines that proposals for new or improved community facilities should:
  - Be well located and accessible to its catchment population including by foot and cycle.
  - Not have a significant adverse impact itself or cumulatively in terms of the scale or nature of traffic generated.
  - Demonstrate that opportunities to maximise shared use have been explored.
- 6.36 The application in this case is accompanied by a Transport Statement which outlines that:
  - the Site is expected to accommodate in the region of 1,300 cremations per year with services held on weekdays between the hours of 10:00am and 4:00pm. Between 15 and 20 woodland burials per year are expected.
  - Vehicular access to the site would come from the existing point of access on the A142 Ireton's Way.
  - An existing vehicular access to the north of the Site would facilitate shared recreational use.
  - Experience of other existing crematorium sites, and traffic studies undertaken, indicate that cremation services will typically generate in the region of 15 vehicle arrivals per service on average. Whilst numbers will of course fluctuate between services, it is

important to note that service times are carefully planned/managed and normally take place at off-peak times of the day. Therefore, associated vehicle movements also largely occur at off-peak times and tend to have little impact on existing traffic flows on the surrounding highway network during peak periods.

- It is estimated that the proposed facility in this case would accommodate in the region of five services per day as a maximum. With an allowance for 27 other vehicles/general visitors per day, there is likely to be a total of 102 vehicle arrivals or 204 total two-way trips. Set against that, TRICS data obtained for various "watersports centres" indicates a total of 55 vehicle movements per day associated with the authorised use as an Outdoor Centre. The resultant increase of circa 149 vehicular movements per day is therefore considered to be a modest number and would not result in any significant effects in terms of highway safety of capacity.
- In terms of sustainable transport, the Site is served by bus stops immediately adjacent the Site access on the A142 Ireton's Way. However, the nature of the use does mean that shared use of the private car is the most common form of transport.
- The impact of the construction phase of any development would be dependent on various factors including the final programme of construction works, import/export of materials and construction processes adopted, and would in any event be controlled through a Construction Environmental Management Plan.
- 6.37 Having regard to the above it is clear that the proposal complies with relevant policy at the national and the local level.
  - iii. Achieving well-designed Places
- 6.38 The Framework at Paragraphs 124-132 provides extensive guidance regarding design. Of note Paragraph 124 makes it clear that the creation of quality buildings and places is fundamental to what the planning and development process should achieve. Paragraph 127 outlines that planning decisions should ensure that, amongst other things, developments will:
  - function well and add to the overall quality of an area,
  - are visually attractive as a result of good architecture, layout and appropriate and

effective landscaping;

- are sympathetic to local character and history;
- establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials;
- optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development.
- 6.39 The East Cambridgeshire Design Guide SPD outlines extensive guidance for new development. The majority of that guidance relates to residential development but it does reiterate the need for well designed, sustainable development that has regard to the character of the area.
- 6.40 Section 26 of the NPPG refers to design and reiterates the objectives of the Framework in stating that good design is an integral part of sustainable development. It goes on to outline that planning permission should not be refused for development which demonstrates good design and which promotes high levels of sustainability because of concerns about incompatibility with an existing townscape Paragraph 26-004. Design is not seen as the preserve of specialists but should also include the views of local communities.
- 6.41 The National Design Guide outlines extensive guidance, but notably at paragraph 56 outlines that:

"Materials construction details and planting are selected with care for their context. They are attractive but also practical, durable and affordable. They contribute to visual appeal and local distinctiveness. In well-designed buildings, the materials and details suit the design concept and they are consistently followed through the construction process to completion".

- 6.42 Policy ENV1 suggests that proposals for development should be informed by, be sympathetic to, and respect the capacity of distinctive character areas defined in the Cambridgeshire Landscape Guidelines.
- 6.43 ENV2 of the ECDC outlines that all development will be designed to a high quality, enhancing and complementing local distinctiveness and public amenity by relating well to existing features and introducing appropriate new designs.

- 6.44 The application is accompanied by a Design and Access Statement DAS which addresses issues including:
  - Site analysis;
  - Design evolution and consultation process;
  - The design response including:
    - Design concept;
    - Response to public consultation;
    - Routes and movement;
    - Landscape and open space, and;
    - $\circ$  The wider masterplan.
- 6.45 Specifically, it outlines that the crematorium building would combine a collection of independent structures connected by single storey elements. A natural flow would be created between the car park to the main chapel and onwards to the external areas including the flower court via a timber boardwalk.
- 6.46 A simple palate of materials, designed to sit comfortably within the site context have been selected. Namely, stained timber cladding to the main chapel building and canopy structures at either end with selected use of recycled uPVC elsewhere. The proposed function building would be pre-fabricated structure with dark stained timber and a corrugated pitched roof.
- 6.47 The DAS demonstrates that the proposal would result in a development which is appropriate for its setting in terms of design and character in accordance with policy at the local level including ENV1 and ENV2 of the ECLP, and national policy including relevant paragraphs of the Framework and NPPG.

#### Residential Amenity

- 6.48 The Framework at Paragraph 127 is also clear that planning decisions should ensure a high standard of amenity for existing and future users.
- 6.49 Policy ENV1 of the ECDC outlines that development should, where possible, enhance public amenity and access. Policy COM4 also suggests that new community facilities should not have an adverse

impact on the amenity of nearby properties.

6.50 The Site in this case is largely surrounded by open countryside, punctuated by dispersed commercial development including the adjoining anaerobic digestion plant. Guidelines suggest that crematoria development should be at least 200 yards 183m from adjoining residential properties. The proposal would substantially exceed that requirement and would have no adverse impact on neighbouring amenity.

#### Sustainable Design and Construction

- 6.51 The Framework at Paragraph 150 outlines that new development should be planned for in ways that help reduce greenhouse gas emissions. At Paragraph 153 it outlines that local planning authorities should expect new development to comply with any development plan policies on local requirements for decentralised energy as well as taking account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.
- 6.52 Policy ENV4 of the ECDC suggests that all proposals for new development should aim for reduced or zero carbon development. All non-domestic developments of 1000m2 or more are required to meet BREEAM Very Good standard or equivalent.
- 6.53 The proposal in this case would incorporate a range of measures intended to improve the sustainability of the building including a recovery system as part of the heating and hot water strategy. The layout and volume of spaces would allow for natural ventilation to be maximised whilst electric charging points would be provided throughout the parking areas. Finally, the scheme also proposes the installation of solar panels to the roofs of crematorium buildings with on-site battery storage so that the scheme is capable of meeting 70% of its electricity needs through renewables.

#### iv. Promoting Sustainable Development

#### Planning and Flood Risk

6.54 The Framework clarifies at Paragraph 155 that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk. At Paragraph 163, it makes it clear that when determining planning applications, local planning authorities should ensure that flood risk is not increased elsewhere.

- 6.55 Paragraph 157 outlines that all plans should apply a sequential, risk based approach to location of development. At 158, it outlines that the aim of the sequential test is to steer new development to areas with the lowest risk of flooding. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of development.
- 6.56 Policy ENV8 of the ECDC outlines that all developments should contribute to an overall flood risk reduction. Development will not be permitted where
  - It would intensify the risk of flooding during the lifetime of the development taking into account climate change allowances, unless suitable flood management and mitigation measures can be agreed and implemented;
  - It would increase the risk of flooding elsewhere during the lifetime of the development;
  - It would have a detrimental effect on existing flood defences or inhibit flood control and maintenance work;
  - The risk of flooding would cause an unacceptable risk to safety; or
  - Safe access is not achievable at time of flooding.
- 6.57 The application is accompanied by a Flood Risk Assessment which outlines that the Site is within an area protected by flood defences. However, discussions with the Environment Agency have clarified that as a consequence, the Site should be treated as though it is in Flood Zone 3a.
- 6.58 As a consequence, having regard to the Framework at Paragraphs 157 and 158 of the Framework, the application is accompanied by Sequential Test which seeks to determine whether suitable land exists in areas with a lower flood risk. Building upon the Alternative Site Assessment referenced above, it adopts a similar methodology but concentrates on land outside of settlement boundaries. It finds that a range of sites within Flood Zone 1 meet the basis requirements for crematorium development. However, further assessment at the site specific level finds that for a variety of reasons they cannot be deemed reasonably available and should not be preferred over the Mepal Outdoor Centre.
- 6.59 More generally, the submitted FRA outlines that the Site has minimal to no risk of flooding from the following sources: Pluvial, the Sea, Tidal, Canals, Sewers and Groundwater, and there have been no historical flooding events in the immediate surrounding area on record.

- 6.60 The proposed drainage strategy for the site would follow the SuDS management train, considering the use of infiltration systems, such as permeable paving and soakaways first, subject to infiltration tests being undertaken. However, if these tests determine that infiltration is not possible, an attenuated discharge into the lake is a feasible option, providing the discharge rate does not exceed the acceptable flow rate of 5l/s, as per the guidance set out in the HR Wallingford Greenfield Runoff Rate Estimation Tool.
- 6.61 The site layout will be designed with evacuation procedures in mind, and a suitable evacuation and warning procedure will be implemented by the operator.
- 6.62 Give that the proposal complies fully with policy ENV8 of the ECLP and national policy in the Framework in terms of flooding and drainage.

#### v. Conserving and Enhancing the Natural Environment

- 6.63 The Framework at Paragraph 170 states that the planning system should contribute and enhance the natural and local environment by:
  - i. Protecting and enhancing valued landscapes;
  - ii. Recognising the intrinsic character and beauty of the countryside;
  - iii. Minimising impacts on and providing net gains for biodiversity;
  - iv. Preventing new development from contributing to, or being put at unacceptable risk from unacceptable levels of soil, air, water or noise pollution; and
  - v. Provide for remediating and mitigating degraded land where possible.
- 6.64 Those issues are addressed below in so far as they relate to the proposed development.

#### Landscape / Visual Impact

6.65 Policy ENV1 of the ECLP outlines that development should be informed by, be sympathetic to, and respect the capacity of the distinctive character areas defined in the Cambridgeshire Landscape Guidelines. Specifically, development proposals should demonstrate that their location, scale, form, design, materials, colour, edge treatment and structural landscaping will create positive, complementary relationships with existing development. It should protect, conserve and where

possible enhance a range of attributes including traditional landscape features, visually sensitive skylines, key views as well as the unspoilt nature and tranquillity of the area.

- 6.66 The application is accompanied by a Landscape and Visual Impact Assessment which, amongst other things, outlines that the proposed structures, at a maximum of 8.51m, would be lower in height than the existing structures, the highest of which is the tee-pee which at the pinnacle reaches 18.17m. Furthermore the overall floor space would be reduced from 825m2 to 526m2.
- 6.67 Even so, it outlines a series of mitigation measures designed to reduce the visual impact of development further including appropriate landscaping and boundary treatments along with appropriate siting of the development and limiting the extent of development to the existing built footprint.
- 6.68 As a consequence, it makes it clear that given the proposal is of a scale, type and design which is appropriate for the Site and the surrounding area. It would have a negligible visual impact on the surrounding landscape. The proposal therefore fully accords with Policy ENV1 of the ECLP and guidance from the Framework.

#### Habitats and Biodiversity

- 6.69 Policy ENV7 of the ECLP outlines that all development proposals will be required to protect the biodiversity and geological value of land and buildings and minimise harm to or loss of environmental features, including trees, woodland and water features. Appropriate mitigation measures, reinstatement or replacement of features and/or compensatory work should be provided whilst opportunities for creation, restoration, enhancement and connection of natural habitats as integral parts of development proposals should be maximised.
- 6.70 The Framework at Paragraph 170 outlines that decisions should contribute to and enhance the local environment by amongst other things, minimising impacts on and providing net gains for biodiversity.
- 6.71 Paragraph 175 outlines a range of principles that local planning authorities should apply when determining planning applications, including:

- 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;
- b development resulting in the loss or deterioration of irreplaceable habitats such as ancient woodland and ancient or veteran trees should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and
- c development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity.
- 6.72 The application is accompanied by a comprehensive suite of ecological reports prepared by Syntegra Consulting including an Ecological Impact Assessment which outlines that the Site supports several protected and notable species. However, mitigation measures, precautionary measures and compensation measures have been recommended for individual species to be secured by CEMP, LEMP and landscape plan. With the implementation of mitigation and precautionary measures, the development is not expected to result in adverse residual effects to identified ecological features.
- 6.73 Furthermore, the report outlines a series enhancement measures designed to ensure net gains for biodiversity. Given that, the proposal complies with Policy ENV7 of the ECLP and the Framework.

#### <u>Noise</u>

- 6.74 Policy ENV9 of the ECDC is clear that all development proposals should minimise, and where possible, reduce emissions and other forms of pollution including noise pollution. Proposals will be refused where, either individually or cumulatively, there are unacceptable impacts arising from the development including in terms of noise. In exceptional cases, development may be permitted where the environmental benefits as well as the wider social and economic need for the development substantially outweigh any adverse impact in terms of pollution.
- 6.75 The application is accompanied by a Noise assessment prepared by Cass Allen which outlines that noise levels across the Site are dictated by road noise from the adjacent Ireton's Way. No significant



noise was identified from commercial uses.

6.76 New plant and other equipment at the Site can be designed to achieve appropriate noise levels at the nearest sensitive receptors. Noise levels from operation of the development such as the congregation of mourners, vehicles and servicing are deemed "not noticeable". The proposal therefore complies with policy ENV9 of the Framework.

# 7.0 Conclusion

- 7.1 The proposal seeks to change the use of an existing but redundant outdoor activity centre to create a crematorium with associated facilities including outdoor burial space. The adopted Local Plan outlines polices relating to the loss and replacement of community facilities. It is reasonable to assume that the proposed crematorium would be a community use in that context.
- 7.2 This planning statement and accompanying documents demonstrate that the proposed development would comply with policies COM3 and COM4 which deal with loss and replacement of community facilities thus it is considered that the application should be considered acceptable as a matter of principle.
- 7.3 The Planning Statement and the accompanying documents goes on to demonstrate that the proposal would comply with all polices of the development plan in relation to a range of other technical matters including transport, flooding and drainage and landscape impact.
- 7.4 It is therefore concluded that the application complies fully with an up-to development plan for East Cambridgeshire and in accordance with the Framework at Paragraph 11 should thus be approved without delay.



# **Appendix 1: Screening Request**

#### **Planning Department**

East Cambridgeshire District Council The Grange Nutholt Lane Ely Cambridgeshire CB7 4EE NEXUS

#### Reading

5<sup>th</sup> Floor Thames Tower Station Road Reading RGI 1LX

nexusplanning.co.uk

17<sup>th</sup> May 2021

Our Ref: 34847

Dear Sir / Madam,

#### Town and Country Planning (Environmental Impact Assessment) Regulations 2017 Request for a Screening Opinion Former Mepal Outdoor Centre, Chatteris Road, Mepal, Ely, Cambridgeshire CB6 2AZ

On behalf of East Cambs Trading Co Ltd the "client", we write to advise that a detailed planning application will shortly be submitted on the Former Mepal Outdoor Centre, Chatteris Road, Mepal, Ely, Cambridgeshire CB6 2AZ "the Site". The planning application will be for:

"Construction of a crematorium and associated service and administration building, function building, memorial garden, natural burial areas, pet cemetery, car parking, new vehicular access from the A142 to the north of the site and landscaping" "the Proposed Development"

We are writing to request a formal Screening Opinion from the Council under Regulation 6.1 of the Environmental Impact Assessment Regulations 2017 "the EIA Regulations", to confirm whether or not there is a requirement for an Environmental Impact Assessment "EIA" in respect of the Proposed Development. For the reasons set out below, our conclusions is that an EIA is not required.

In accordance with Regulation 6 2 of the EIA Regulations, this request is accompanied by:

- a a plan sufficient to identify the land Appendix 1;
- b a description of the development including in particular:
  - i. a description of physical characteristics of the development and, where relevant, of demolition works;
  - ii. a description of the location of the development, with particular regard to the environmental sensitivity of geographical areas likely to be affected;

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#### The Mepal Centre - Request for a Screening Opinion continued

- c a description of the aspects of the environment likely to be significantly affected of the Proposed Development;
- d to the extent the information is available, a description of any likely significant effects of the proposed development on the environment resulting from
  - i. the expected residues and emissions and production of waste, where relevant; and
  - ii. the use of natural resources, in particular soil, land, water and biodiversity; and
- e such other information or representations as the person making the request may wish to provide or make, including any features of the proposed development or any measures envisaged to avoid or prevent what might otherwise have been significantly adverse effects on the environment.

Having regard to the Council's published validation requirements, it is anticipated that the following reports will accompany a planning application for the Proposed Development:

- Full package of drawings;
- Air Quality Assessment
- Preliminary Ecological Appraisal
- Ecological Impact Assessment
- Biodiversity Audit Survey and Management Plan
- Phase 1 and 2 Contamination Report
- Design and Access Statement Architectural
- Design and Access Statement Landscape Architecture
- Flood Risk Assessment
- Groundwater Risk Assessment
- Drainage Strategy Report
- Landscape Visual Impact Assessment
- Noise Impact Assessment
- Statement of Community Involvement
- Transport Statement
- Stage 1 Road Safety Audit
- Tree Survey Report

Further information to support the screening request, provided by a professional technical team, has been incorporated into this letter in respect of:

- Highways;
- Landscape and Visual;
- Ecology;
- Flood Risk; and
- Air Quality.

#### Location / Site

The Site measures approximately 13.5 hectares in area and is located to the western side of the A142 in East Cambridgeshire. Situated in open countryside, the closest settlement is Mepal, circa 3km away from the Site to the south along the A142 with the larger settlement of Chatteris slightly further away from the Site to the north.

The land was historically used an aggregate quarry, but was later converted for use as an outdoor activity centre for activities including archery, rock climbing, sailing and canoeing amongst others. In that regard, a large proportion of the Site to the north and west now contains a lake. The south eastern area includes a cluster of

buildings of different scale and design, all associated with the outdoor centre. This area also contains a fairly large surface level car park with a single means of vehicular access from the A142.

The "Pretoria Energy" anaerobic digester site directly adjoins the Site to the north. Land to the east of the A412 is still in use for the quarrying of aggregates whilst surrounding land is in active agricultural use.

In terms of constraints, Environment Agency mapping shows that Site is in an area that benefits from flood defences. The Site is in also in close proximity to several designated wildlife sites including the Ouse Washes Site of Special Scientific Interest. Furthermore, it forms part of the wider Mepal Gravel Pits complex, a County Wildlife Site

The Policies Map for East Cambridgeshire suggests that the Site is within a Minerals Consultation Area and a Waste Consultation Area. It is however otherwise largely unconstrained.

#### **Requirement for an EIA**

The Proposed Development does not fall within any category listed under Schedule 1 of the EIA Regulations. However, it does fall within item 10 b of the EIA Regulations as an 'Urban Development Project' due to the Site exceeding five hectares and as a result, would comprise Schedule 2 development for the purposes of the EIA Regulations. However, this does not automatically trigger the need for an EIA, instead the EIA Regulations require that an EIA be undertaken where a Schedule 2 development is *"likely to have significant effects on the environment by virtue of factors such as such as its nature, size or location."* Indeed, the Planning Policy Guidance "PPG" ID-4-018-20170728 states that *"only a very small proportion of schedule 2 development will require an assessment"*.

In order to assess the potential for any likely significant environmental effects, the selection criteria contained in Schedule 3 of the EIA Regulations should be applied. These are:

- a the characteristics of development having regard to size and design, cumulative impacts, the use of natural resources, production of waste, pollution and nuisances, risk of major accidents and risk to human health ;
- b the location of development by reference to the environmental sensitivity of the area; and
- c the type and characteristic of the potential impact having regard to the magnitude and spatial extent, nature, transboundary, intensity and complexity, probability, expected onset, duration frequency and reversibility, cumulative impact and possibility of effectively reducing the impact .

Items a and c of the above criteria will be explored within the following sections of this screening request. Item b has been provided at the introduction to this screening letter and is informed by the attached plan.

It should be noted that the EIA Regulations require EIAs for qualifying developments where there are likely to have <u>significant</u> environmental impacts, and not solely where there would be likely environmental impacts that could be mitigated. Where likely impacts have been identified and potential mitigation is known to be capable of reducing such impacts to less than "significant", then such environmental considerations would be sufficient to conclude that EIA is not required.

The characteristics of the development and potential environmental impacts are explored below.

#### **Characteristics of Development**

The Proposed Development would provide a new crematorium for East Cambridgeshire District. The application proposals will further involve the following:

- Construction of a combined crematorium, main chapel, and side chapel;
- Reception Building;
- A modular function building;
- Pet Cemetery;
- Memorial walls;
- Natural burial area;
- Car parking and improvement of site access;
- Provision of a new vehicular access from the A142.

The proposed crematorium building would accommodate a flexible multi-faith hall for up to 125 people. It would be linked to an ancillary structure accommodating staff at the Site whilst a separate structure would provide function space and toilet facilities. The main buildings would be connected by a series of flat roofed links and a covered external canopy to the front of the main service hall.

More generally, the Proposed Development would comprise:

#### Burial and Internment

- 294 natural burials
- 290 in-ground ash internment
- 120 pet burial
- provision for ash scattering

#### Parking

- 67 standard, main car park of which 6 in staff area & 16 electric charging
- 30 standard overflow / natural burial area
- 6 standard staff parking
- 20 disabled 11 main car park, 4 natural burial/overflow, 3 multi-function building, 2 staff
- 5 hearse / limousine parking areas 3 near cemetery and 2 near natural burial area
- 3 mini-bus parking area

#### **Characteristics of the Potential Impact**

Some environmental impacts as a result of the Proposed Development are of course anticipated, but any environmental impacts arising from the Proposed Development will be addressed through the supporting reports that will accompany the planning application. It is considered, however, that the potential impact upon the general amenities and character of the surrounding area will not be significant giving the scale and extent of the existing built development when compared to the proposed structures, which are comparable in terms of scale and appropriate for their setting in terms of design. There may also be the potential for landscape and habitat enhancement as a result of the Proposed Development.

#### <u>Highways</u>

A Transport Assessment will be prepared in connection with the Proposed Development which considers in detail the potential impact on the highway network. Analysis to date indicates that the Site is expected to accommodate up to 1,300 cremations per year with services held on weekdays between the hours of 10:00am and 4:00pm. Between 15 and 20 woodland burials per year are expected.

Vehicular access to the site would come from the existing point of access on the A142 Ireton's Way. A secondary access further to the north from the A142 via the northern boundary is also proposed. However, the accompanying car park would be modest in size providing space for circa 6 vehicles and as such, vehicular trips are expected to be low as a result.

Experience of other existing crematorium sites, and traffic studies undertaken, indicate that cremation services will typically generate in the region of 15 vehicle arrivals per service on average. Whilst numbers will of course fluctuate between services, it is important to note that service times are carefully planned/managed and normally take place at off-peak times of the day. Therefore, associated vehicle movements also largely occur at off-peak times and tend to have little impact on existing traffic flows on the surrounding highway network during peak periods.

It is estimated that the proposed facility in this case would accommodate in the region of five services per day as a maximum. With an allowance for 27 other vehicles/general visitors per day, there is likely to be a total of 102 vehicle arrivals or 204 total two-way trips. Set against that, TRICS data obtained for various "watersports centres" indicates a total of 55 vehicle movements per day associated with the authorised use as an Outdoor Centre. The resultant increase of circa 149 vehicular movements per day is therefore considered to be a modest number and would not result in any significant effects in terms of highway safety of capacity.

The impact of the construction phase of any development would be dependent on various factors including the final programme of construction works, import/export of materials and construction processes adopted, and would in any event be controlled through a Construction Environmental Management Plan.

It is therefore considered that transport considerations would not form a justified basis upon which to require an EIA by virtue of potential environmental impacts falling short of significant.

#### Landscape and Visual

The Site is located outside of any Area of Outstanding Natural Beauty, nor is it subject to a local landscape designation.

The Site is enclosed, at least in part, by hedgerows and other planting whilst views from the north are obscured partially by the existing anaerobic digestion plant. The surrounding area comprises for the most part open farm land. The settlement of Mepal is located further south beyond the railway line with Chatteris further away to the north.

The Proposed Development will be supported by a Landscape and Visual Impact Assessment LVIA. The landscape analysis carried out to date indicates that the existing landscape is of moderate sensitivity, whilst the proposal could have a moderate / minor landscape impact. Principally because the proposed structures will be

located primarily on previously developed parts of the site. In turn, the proposed structures would have a reduced mass and bulk when compared to the existing, albeit with a modest increase in parking. Remaining parts of the site would be subject to a maintenance process but otherwise would be largely untouched.

Given those factors, it is expected that and visual impacts would be largely limited to site level and would not materially impact upon the wider landscape. It is therefore considered that the landscape and visual considerations would not form a justified basis upon which to require an EIA as the residual potential environmental impacts are very likely to fall short of significant.

#### <u>Ecology</u>

Syntegra Consulting has undertaken a preliminary ecological appraisal which confirms that the site comprises a former gravel pit with derelict buildings. Boundaries consist of hedgerows with broken areas. It forms part of the wider Mepal Gravel Pits complex, a County Wildlife Site which encompasses the Site and an additional lake and drainage ditches within 500m albeit separated by a significant barrier in the form of the A142.

Habitats on site are considered to be of moderate to high ecological value whilst the presence of protected species has moderate to high potential. It includes poor semi-improved grassland with patches of encroaching scrub.

Mature trees and outbuildings have been subject to ground level roost assessment. Eleven trees and five outbuildings ranged from low to moderate potential for roosting bats whilst habitats on site provide good foraging and traversing grounds for bats. Vandalism at the Site has reduced the potential for nesting birds and buildings with low potential would be demolished under a watching brief. Lakes have been stocked with fish and the Environment Agency have been contacted in order to determine the species present.

Overall, the nature of the proposed development including demolition of the existing buildings and selective site clearance combined with the size of the site would help to ensure a minor impact on surrounding habitats, protected species and wildlife in general, which can all be compensated with further surveys, mitigation measures, precautionary measures and enhancements in place. With targeted recommendations to enhance biodiversity the proposed development will increase the ecological value of the site and result in biodiversity net gains. A number of specific surveys, mitigation measures and precautionary methods are recommended, including additional surveys for the following species:

- Breeding wintering birds;
- Reptiles;
- Badgers;
- Otters;
- Dormouse; and
- Water vole.

As such, it is clear that ecological considerations would not form a justified basis upon which to require an EIA as the residual potential environmental impacts will fall short of significant.

#### Flood Risk

The Site is in the vicinity of various water sources and the Environment Agency Flood Map confirms that the Site and the surrounding land is within Flood Zone 3. However, it also shows that the majority of the Site is in

an area protected by flood defences. The Environment Agency has confirmed that the Site should be treated as though it is within Flood Zone 3a as a result of the existing defences.

In accordance with National Policy, the application will be accompanied by a Sequential Test which will determine whether there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding

However, it is noted in any event that amenity open space, outdoor sports and recreation and essential facilities are deemed "water compatible" uses within the Flood Risk and Coastal Change Planning Practice Guidance at Table 2: Flood risk vulnerability classification. Whereas, buildings used for "assembly and leisure" are deemed to be "less vulnerable". It is also noted that crematoria are not specifically identified within Table 2, but it is considered that crematoria could equally be described as an assembly use and thus the proposal would be no more vulnerable to flooding than the existing development.

Table 3: Flood risk vulnerability and flood zone 'compatibility' from the Flood Risk and Coastal Change Planning Practice Guidance makes it clear that less vulnerable development within Flood Zone 3a is appropriate.

A Flood Risk Assessment will be prepared in support of the proposed development to demonstrate that the Site is not at risk of flooding, nor would it increase flood risk elsewhere. It is not expected that issues of flooding and drainage would therefore form a justified basis upon which to require an EIA given that the residual potential cumulative impacts would fall short of significant.

#### Air Quality

A review of the Department for Environment Food and Rural Affairs map confirms that the Site is not located within an Air Quality Management Area, as does the adopted Proposals Map.

An Air Quality Assessment will be submitted with the application and will assess the air quality effects of the construction phase and the operational phase of the development. Within this report, any necessary mitigation measures will be identified, for example, reducing dust during the construction phase and of course reducing emissions when operational in accordance with statutory guidance.

On this basis, it is not considered that air quality considerations would form a justified basis upon which to require an EIA as the residual potential environmental impacts are likely to fall short of significant.

#### Cumulative Impact

The Site is in a relatively open landscape surrounded by extensive areas of farmland. There are no significant commitments in the surrounding area that would give rise to concerns from a cumulative perspective.

#### Summary

The EIA Regulations are specifically designed to consider the potential environmental impacts for developments both individually or in combination with nearby developments. The likelihood of impacts alone is not sufficient, in accordance with the EIA Regulations, to consider the proposal to be EIA development. It would also not be sufficient where there is potential or likelihood for significant environmental impacts where the presence of suitable mitigation is already known that would reduce the potential impact to "less than significant".

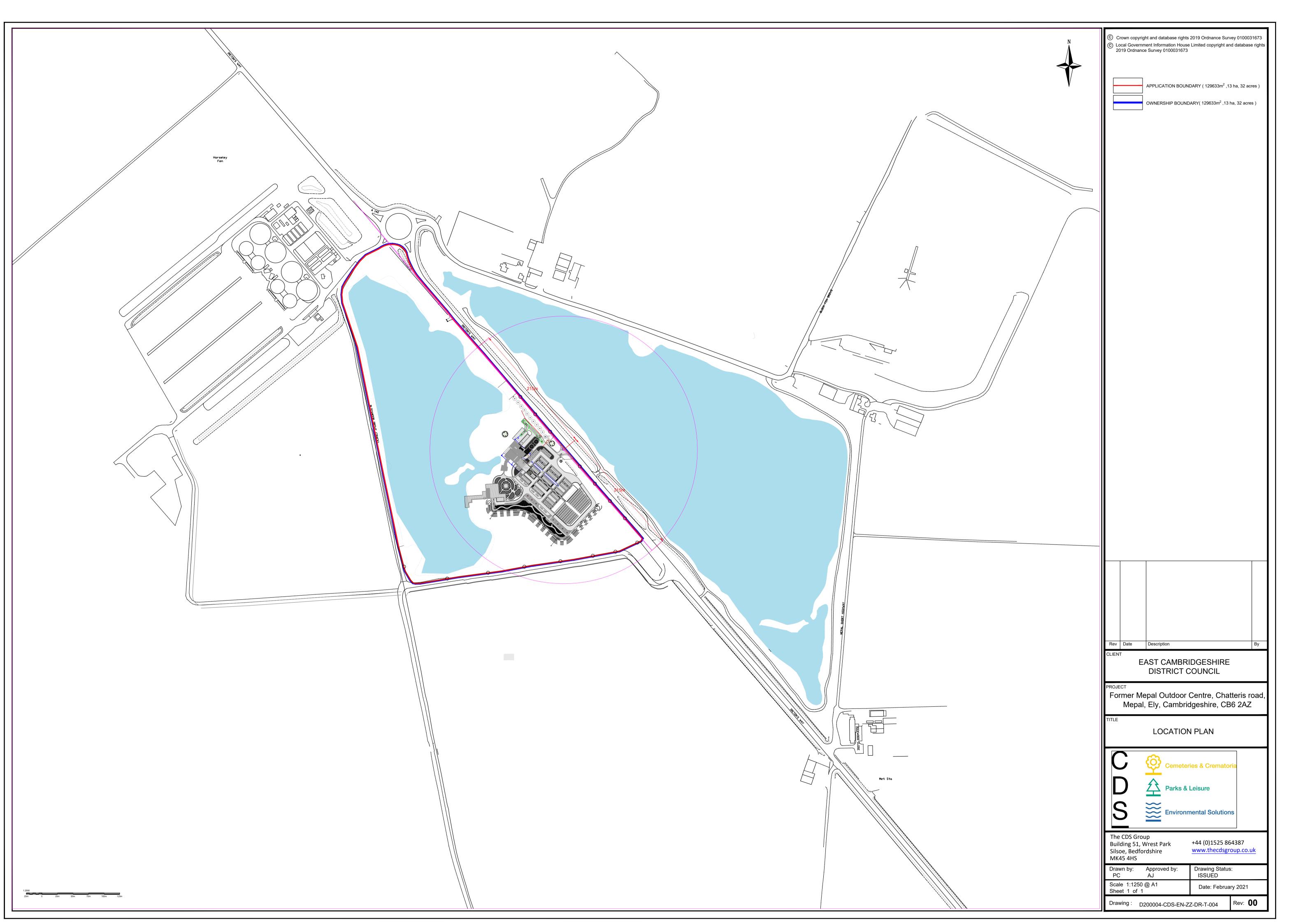
Against the above background, the conclusion of our assessment is that the Proposed Development should not be considered EIA development, and that an Environmental Statement is not required. EIAs should be reserved, as intended by the legislation, for developments which have a realistic likelihood of causing significant environmental impacts individually or in combination with other developments and it is clear from the above that the Proposed Development would not cause such impact. In line with Regulation 5 9 of the EIA Regulations 2017, it is noted that the Council has 21 days from the date of receipt to issue a Screening Opinion.

I trust that you have sufficient information to determine whether the Proposed Development is EIA development under the EIA Regulations. However, should you need any further clarification please do not hesitate to contact me.

Yours faithfully,

Show an

**Steven Doel** Associate Director





# **Appendix 2: Screening Opinion**



East Cambs Trading Co Ltd C/O Nexus Planning FAO Mr Steven Doel 5th Floor Thames Tower Station Road Reading RG1 1LX EAST CAMBRIDGESHIRE DISTRICT COUNCIL THE GRANGE, NUTHOLT LANE, ELY, CAMBRIDGESHIRE CB7 4EE Telephone: Ely (01353) 665555 DX41001 ELY Fax: (01353) 665240 www.eastcambs.gov.uk

This matter is being dealt with by:

Anne James

Telephone:01353 616241E-mail:anne.james@eastcambs.gov.ukMy Ref:21/00681/SCREENYour ref

9th August 2021

Dear Sir/Madam

Request for Screening Opinion under Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

Proposal:SCREENING OPINION - Proposed Construction of a crematorium and<br/>associated service and administration building, function building, memorial<br/>garden, natural burial areas, pet cemetery, car parking, new vehicular access<br/>from the A142 to the north of the site and landscaping<br/>Location:Location:Mepal Outdoor Centre Chatteris Road Mepal Ely Cambridgeshire

I write following your Screening Opinion Request, received in this department on 17th May 2021

The Local Planning Authority has considered the proposed development, taking into account the selection criteria set out in Schedule 6 of the Regulations, as are relevant to the development, and has adopted the following opinion:

#### The proposed development does not constitute EiA development.

A copy of the Council's screening exercise is enclosed, which provides further detail on the reasons for the Council's opinion for your information. Copies of the consultation responses received can be viewed on the Councils website through Public Access using the reference given above.

Yours faithfully,

Rebecca Saunt Planning Manager

# **Appendix 3: Disposal of the Site – Summary Note**

#### Summary Note: Efforts made by ECDC for the Re-use of the Mepal Site

Initial expressions of interest being sought for the future use of the site following the marketing of the site, consistent with requirements under the Local Government Act 1972 for the disposal of an asset.

This required applicants to submit their trading history and certified accounts.

10 parties submitted expressions of interest following the first series of advertisements and the quality of the expressions of interest highlighted a need to readvertise because of the quality of the expressions of interest.

Following the re-advertising of the opportunity there were a further 10 expressions of interests which were evaluated with 5 parties being shortlisted for Best and Final Proposals.

Only 3 of the 5 shortlisted parties submitted Best and Final Proposals against the requirements set out by the Council. These were then evaluated against the pre-set evaluation criteria.

An operator of visitor attractions was confirmed through the evaluation process as the Preferred Partner.

The preferred bidder required the Council to off-set their commercial risk on their proposed project by the following:

- a) A management fee being paid by the Council to support the development.
- b) The annual rent should be increased incrementally but start from a level below the market value for the annual rent.
- c) That the Council provide a grant or soft loan to support the cashflow for the proposed project.

Negotiations progressed with the preferred bidder proposing that they purchase the site effectively giving them an asset to borrow against without having to borrow against their other business interests.

The preferred bidder subsequently failed to provide their terms for the project and disposal of the site. The unresolved issue remained the preferred bidder s requirement to offset their commercial risk.

This required alternative uses for the site to be investigated to find a sustainable end use



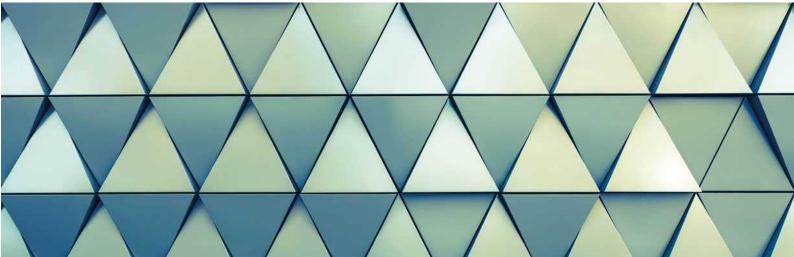
# **Appendix 4: Alternative Site Assessment**

# The Mepal Centre, East Cambridgeshire

# Alternative Site Assessment Report

on behalf of East Cambs Trading Co Ltd.

August 2021



### Contact

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Job reference no: 34847

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# **Appendices**

Appendix 1: Minimum Distance Catchment General Area Appendix 2: Call for Sites (2016) maps Appendix 3: Fenland SHELAA (2020) map

### **1.0 Introduction**

1.1 This report has been prepared by Nexus Planning on behalf of East Cambs Trading Co Ltd ( the Applicant ) to support a planning application being submitted to East Cambridgeshire District Council ( the Council ) for:

'Construction of a crematorium and associated service and administration building, function building, memorial garden, natural burial areas, pet cemetery, car parking, new vehicular access from the A142 north of the site and landscaping" (the Proposed Development).

At

Former Mepal Outdoor Centre, Chatteris Road, Mepal, Ely, Cambridgeshire CB6 2AZ ("the Site")

1.2 The Site in this case is situated outside of defined settlement boundaries in open countryside. The purpose of this report therefore is to review the availability of sites within the urban areas of a defined catchment area and their suitability for accommodating the Proposed Development.

### 2.0 Planning Policy

- 2.1 The development plan for the Council comprises the East Cambridgeshire Local Plan 2015 (ECLP).
- 2.2 For the reasons set out in the accompanying Planning Statement, it is considered that the Proposed Development include the provision of new community facilities . In that regard, Policy COM4 of the ECLP relates to new or improved community facilities and states that:

Proposals for new or improved community facilities should be located within settlement boundaries wherever possible<u>. In exceptional circumstances facilities may be</u> permitted in the countryside, where there is a lack of suitable and available land within <u>settlements, or where a rural location is required</u> (emphasis added):

Proposals for all new or improved community facilities should:

- *Be well located and accessible to its catchment population (including by foot and cycle).*
- Not have a significant adverse impact on the character of the locality, or the amenity of nearby properties.
- Demonstrate that opportunities to maximise shared use have been explored; and
- *Be designed to facilitate future adaptation for alternative community uses or shared use.*
- 2.3 The Planning Statement which accompanies the planning application details why the scheme in this case specifically requires a rural location but for reference, key factors include Section 5 of the Cremation Act 1902 which states that no crematorium shall be constructed nearer to any dwelling-house than two hundred yards, except with the consent in writing of the owner, lessee and occupier of such house(s). Furthermore, the Department of Environment publication The Siting and Planning of Crematoria (1978) states that suitable sites should extend from 2 to 4 hectares and be in a suitable surrounding to enable mourners to have benefit of suitably quiet and peaceful surroundings. This generally means that crematoria will need to be sited beyond settlement boundaries within the countryside.

#### The Mepal Centre, East Cambridgeshire Alternative Sites Assessment

2.4 Accordingly, the Planning Statement concludes that the Proposed Development complies with Policy COM 4 of the ECLP as a rural location is required. Notwithstanding this positive conclusion, for completeness and robustness, this report seeks to determine whether or not suitable and available land within settlements exists which could support the Proposed Development.

### 3.0 Methodology and Approach

- 3.1 The area of search in this case has been determined by the criteria below, all of which are deemed essential in order to accommodate the Proposed Development. The criteria is driven by the very specific requirements relating to the provision of a crematorium, as this forms the principal and driving component of the Proposed Development. Compliance with these criteria indicates that a crematorium could be accommodated but it does not necessarily mean that the Proposed Development could be accommodated in its entirety. Therefore, if a site is identified, it would then be subject to further analysis against the other components of the Proposed Development. The relevant criteria are therefore as follows:
  - A minimum site area of 2 hectares per 1,000 cremation per annum (Federation of Cremation and Burial Authorities (FCBA) Recommendations on the Establishment of Criteria )
  - Site more than 200 yards from a dwellinghouse, at least 50 years from a public highway and outside the consecrated part of the burial ground of any burial authority (Section 5 of the Cremation Act 1902)
  - A location that offers quietness and seclusion (FCBA recommendations on the Establishment of Crematoria )
  - Reasonably accessible by public transport (FCBA Recommendations on the Establishment of Crematoria )
  - Access to adequate water, electricity and drainage services (FCBA Recommendations on the Establishment of Crematoria ).

### 4.0 Area of Search

4.1 As noted above, Policy COM 4 states that proposals for new or improved community facilities should be <u>well located</u> and <u>accessible</u> to its catchment population. Given that requirement, it can reasonably be assumed that any alternative sites would need to be within or within close proximity of the relevant catchment area. The plan at Appendix 1 demonstrates the catchment area that the Proposed Development is intended to serve, indicated by the blue line. This is the Minimum Distance Catchment (MDC), which is the area where residents would be closest to crematorium forming part of the Proposed Development when compared to existing or proposed crematoria in the area. Alternative sites would demonstrably need to fall within the MDC but also fairly centrally within the catchment to serve the same broad area. As a conservative approach, this report therefore considers alternative sites within the central two thirds of the MDC, as shown by the red line at **Appendix 1**.

### 5.0 Sourcing of Sites

- 5.1 The following settlements have been identified within the alternative site assessment area:
  - Chatteris
  - Coveney
  - Ely
  - Haddenham
  - Isleham
  - Little Downham
  - Little Thetford
  - Littleport
  - Mepal
  - Soham
  - Stretham
  - Sutton
  - Wentworth
  - Wilburton
  - Witcham
  - Witchford
- 5.2 This assessment has been based on the Call for Sites submission (2016) which is the latest publicly available information available on the Council s website. Further, the assessment has also included the Strategic Housing and Economic Land Availability Assessment Stage 1 (February 2020) from Fenland District Council due to the overlap of authorities within the MDC.

### **6.0 Assessment of Potential Alternative Sites**

\* ID from East Cambridgeshire District Call for Sites submission (2016)

\*\*ID from Fenland District Council Strategic Housing and Economic Land Availability Assessment (2020)

Site ID.	Minimum site area 2ha	Sited more than 200 yards from a dwellinghouse, at least 50 yards from a public highway and outside consecrated part of the burial ground of any burial authority	A location that offers quietness and seclusion	Reasonably accessible by public transport	Access to adequate water, electricity and drainage services	Comment
		Chatteris				
40009**	Yes	-	-	-	-	Fenland Local Plan (2014) policy LP10 (East Chatteris strategic allocation).
40010**	Yes	-	-	-	-	Fenland Local Plan (2014) policy LP10 (South Chatteris strategic allocation).



Site ID.	Minimum site area 2ha	Sited more than 200 yards from a dwellinghouse, at least 50 yards from a public highway and outside consecrated part of the burial ground of any burial authority	A location that offers quietness and seclusion	Reasonably accessible by public transport	Access to adequate water, electricity and drainage services	Comment
40011**	Yes	-	-	-	-	Fenland Local Plan (2014) policy LP10 (North Chatteris allocation).
40013**	No	-	-	-	-	Site with planning approval
40054**	No	-	-	-	-	Site with planning approval
40167**	No	-	-	-	-	Site with planning approval
40248**	Yes	No	No	Yes	-	
40325**	No	No	No	Yes	-	
40326**	Yes	No	No	Yes	-	
40403**	No	No	No	Yes	-	
40409**	No	No	No	Yes	-	
	1	Coveney				
N/A	Sites included a	re outside settlement boundary				



Site ID.	Minimum site	Sited more than 200 yards from a	A location	Reasonably	Access to	Comment
	area 2ha	dwellinghouse, at least 50 yards	that offers	accessible by	adequate water,	
		from a public highway and outside	quietness	public transport	electricity and	
		consecrated part of the burial	and	· ·	drainage	
		-			-	
		ground of any burial authority	seclusion		services	
		Ely			_	
Site/10/01*	Yes	No	No	Yes	-	
Site/10/02*	Yes	-	-	-	-	East Cambridgeshire Local Plan Policy ELY11 (planning permission 13/01142/RMM).
Site/10/11*	No	-	-	-	-	East Cambridgeshire Local Plan Policy ELY2.
Site/10/12*	No	-	-	-	-	East Cambridgeshire Local Plan Policy ELY3.
Site/10/13*	Yes	-	-	-	-	East Cambridgeshire Local Plan Policy ELY1.
		Hac	ldenham			



Site ID.	Minimum site area 2ha	Sited more than 200 yards from a dwellinghouse, at least 50 yards from a public highway and outside consecrated part of the burial ground of any burial authority	A location that offers quietness and seclusion	Reasonably accessible by public transport	Access to adequate water, electricity and drainage services	Comment
Site/12/09*	No	No	No	Yes	-	
	Г		leham			
Site/13/02*	No	No	No	Yes	-	East Cambridgeshire Local Plan Policy ISL2.
Site/13/07*	No					East Cambridgeshire Local Plan Policy ISL1.
		Little	Downham			
Site/16/01*	No	No	No	Yes	-	East Cambridgeshire Local Plan Policy LTD1.
	·	Little	Thetford			
N/A	Sites included a	re outside settlement boundary	ttleport			
Site /19/01*	No	No	No	Yes	-	
Site/18/01* Site/18/10*	Yes	No	No	Yes	-	East Cambridgeshire



Site ID.	Minimum site area 2ha	Sited more than 200 yards from a dwellinghouse, at least 50 yards from a public highway and outside consecrated part of the burial ground of any burial authority	A location that offers quietness and seclusion	Reasonably accessible by public transport	Access to adequate water, electricity and drainage services	Comment
						Local Plan Policy LIT1 (planning permission 15/01296/ESO)
Site/18/12*	Yes	No	No	Yes	-	Partly within East Cambridgeshire Local Plan Policy LIT2.
			Vepal			•
N/A	Sites included a	re outside settlement boundary.				
	1		oham	T	-	1
Site/23/04*	Yes	No	No	Yes	-	East Cambridgeshire Local Plan Policy SOH1.
Site/23/05*	No	No	No	Yes	-	East Cambridgeshire Local Plan Policy SOH10.
Site/23/06*	Yes	No	No	Yes	-	East



Site ID.	Minimum site area 2ha	Sited more than 200 yards from a dwellinghouse, at least 50 yards from a public highway and outside consecrated part of the burial ground of any burial authority	A location that offers quietness and seclusion	Reasonably accessible by public transport	Access to adequate water, electricity and drainage services	Comment
						Cambridgeshire Local Plan Policy SOH6.
Site/23/08*	Yes	-	-	-	-	East Cambridgeshire Local Plan Policy SOH5.
Site/23/09*	No	No	No	Yes	-	East Cambridgeshire Local Plan Policy SOH9.
Site/23/10*	No	No	No	Yes	-	East Cambridgeshire Local Plan Policy SOH8.
Site/23/12*	Yes	No	No	Yes	-	East Cambridgeshire Local Plan Policy SOH3.
Site/23/13*	Yes	No	No	Yes	-	East Cambridgeshire



Site ID.	Minimum site area 2ha	Sited more than 200 yards from a dwellinghouse, at least 50 yards from a public highway and outside consecrated part of the burial ground of any burial authority	A location that offers quietness and seclusion	Reasonably accessible by public transport	Access to adequate water, electricity and drainage services	Comment
						Local Plan Policy SOH1.
Site/23/15*	Yes	No	No	No	-	East Cambridgeshire Local Plan Policy SOH11.
Site/23/18*	Yes	No	No	Yes	-	East Cambridgeshire Local Plan Policy SOH3.
Site/23/19*	Yes	No	No	Yes	-	East Cambridgeshire Local Plan Policy SOH1.
Site/23/20*	Yes	No	No	Yes	-	East Cambridgeshire Local Plan Policy SOH6.
			retham			
N/A	Sites included a	re outside settlement boundary	•			
	•	Ś	Sutton			



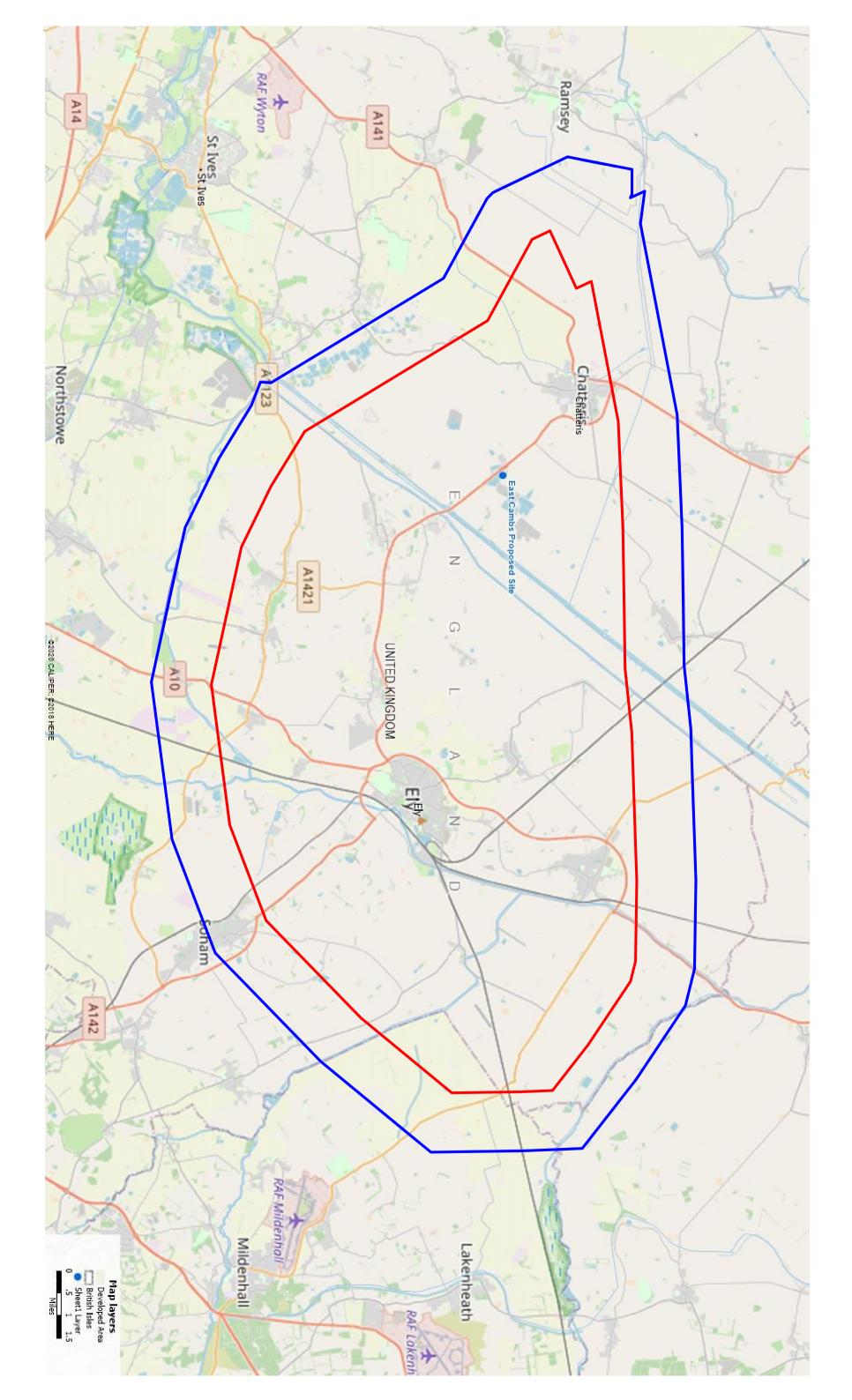
Site ID.	Minimum site	Sited more than 200 yards from a	A location	Reasonably	Access to	Comment		
	area 2ha	dwellinghouse, at least 50 yards	that offers	accessible by	adequate water,			
		from a public highway and outside	quietness	public transport	electricity and			
		consecrated part of the burial	and		drainage			
		ground of any burial authority	seclusion		services			
Site/26/05*	Yes	No	No	Yes	-	Partly falls within East Cambridgeshire Local Plan Policy SUT1.		
	-	We	ntworth			•		
N/A	Site included is a	outside settlement boundary.						
	1	Wi	lburton					
N/A	Sites included an	re outside settlement boundary						
	1	W	itcham					
N/A	No sites include	d.						
	Witchford							
N/A	Sites included an	re outside settlement boundary.						

6.1 Following a review of the East Cambridgeshire Call for Sites (2016) and Fenland SHELAA (2020) no sites met the criteria set out within Section 5 of this report. Maps of the sites submitted within the assessment are provided at **Appendix 2 and 3**.

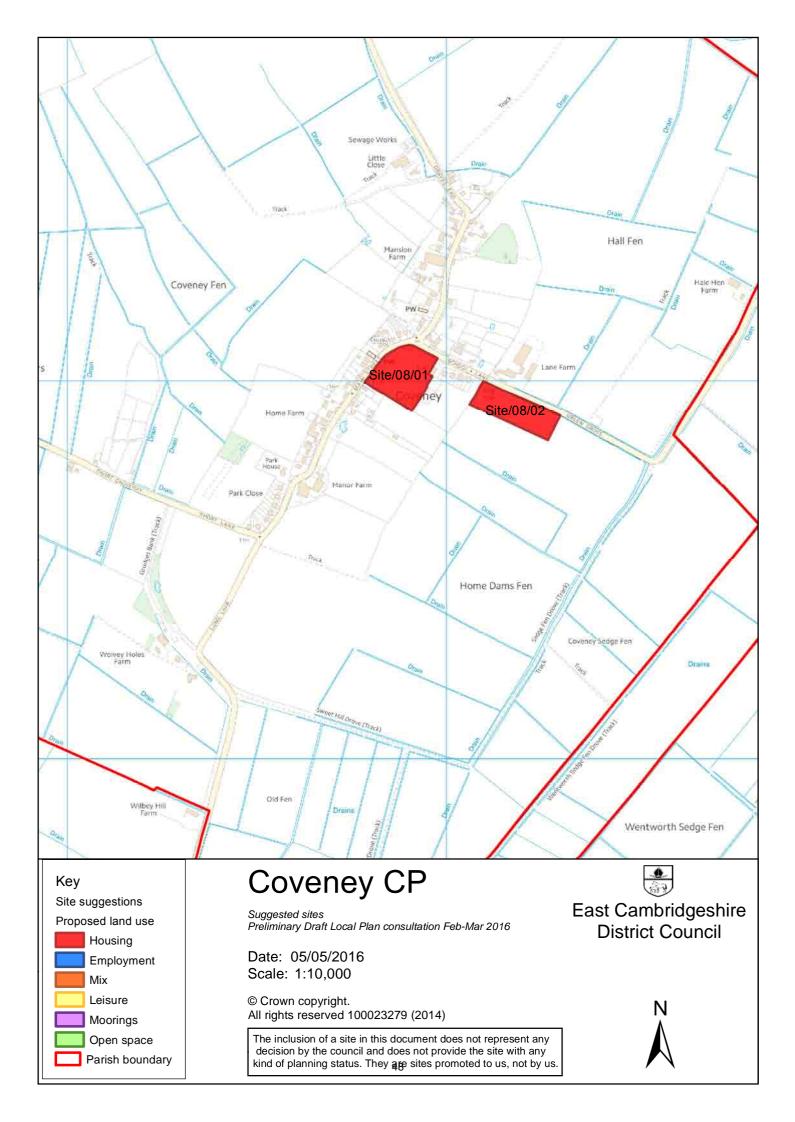
## 7.0 Conclusion

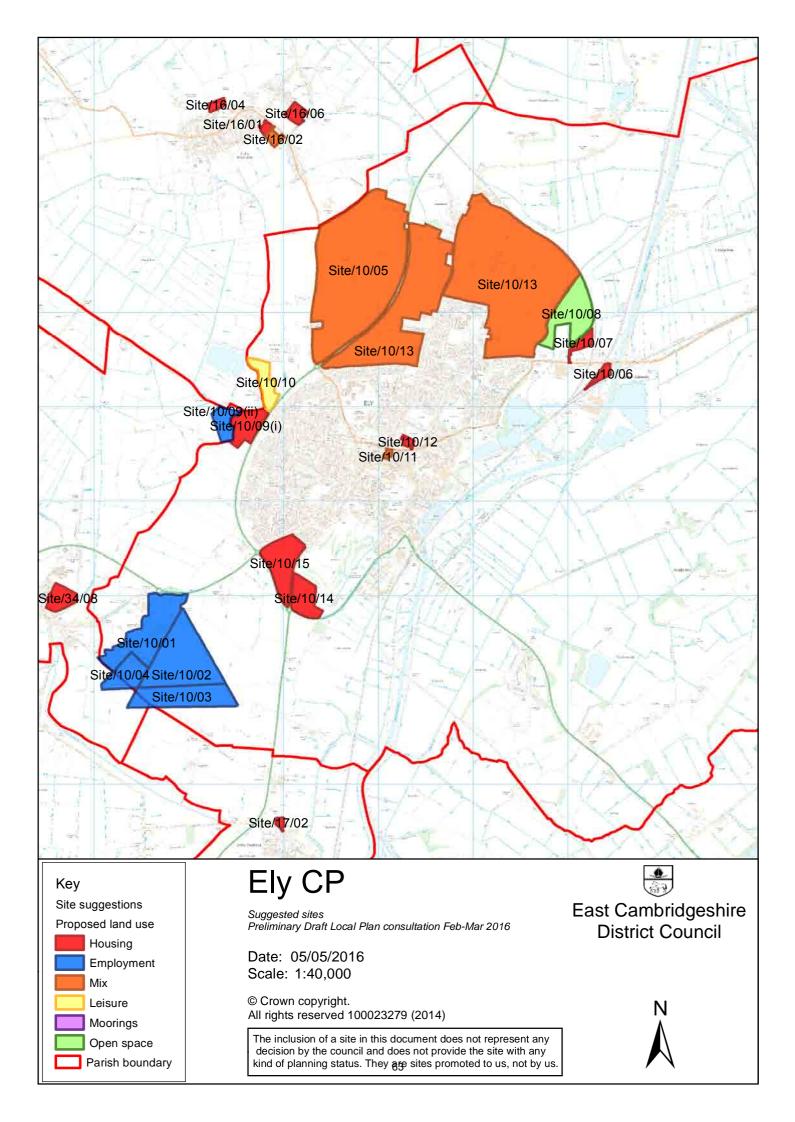
- 7.1 This report reviewed the available Sites submitted within the Council s Call for Sites (2016) document and Fenland s SHELAA (2020) and no alternative sites were available that met the criteria outlined within Section 5 of this report.
- 7.2 Given the above, it can be concluded that there is no suitable and available land within existing settlements and therefore in accordance with Policy COM4, a countryside location is appropriate, in principle.

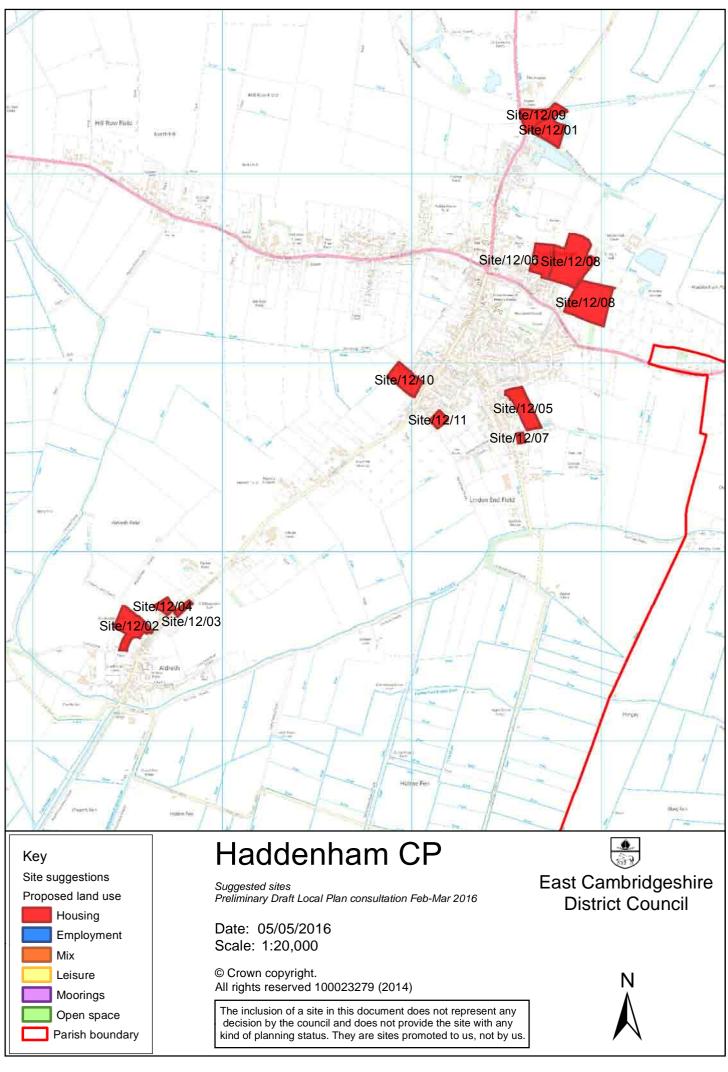
# **Appendix 1: Minimum Distance Catchment General Area**

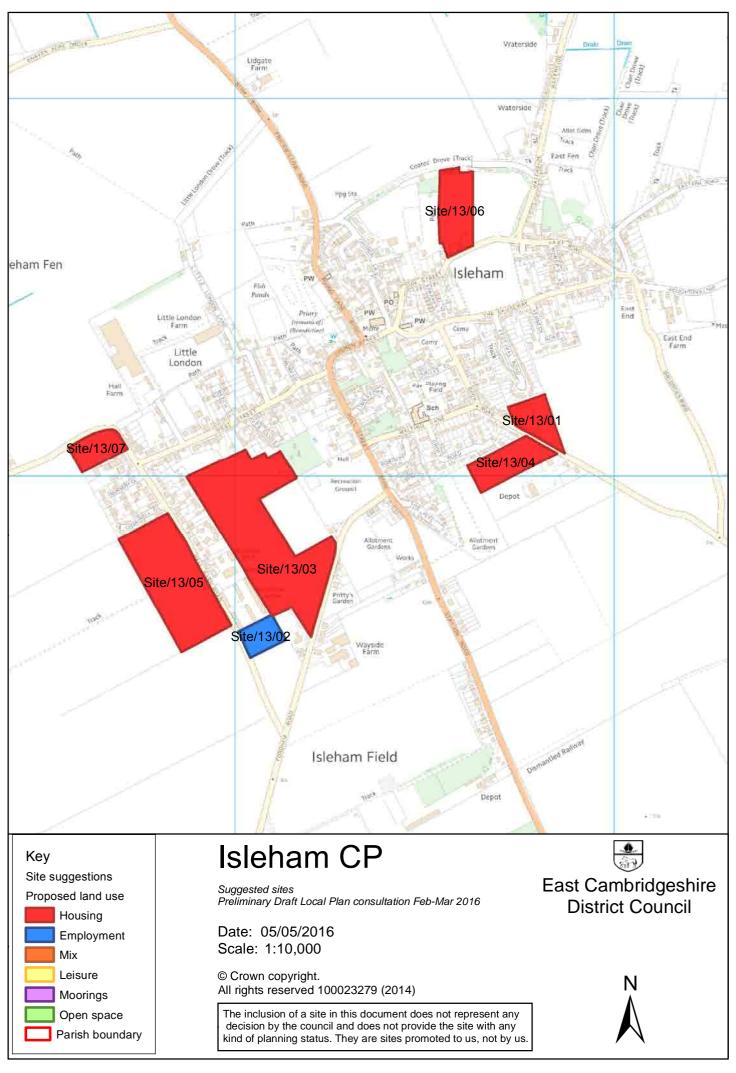


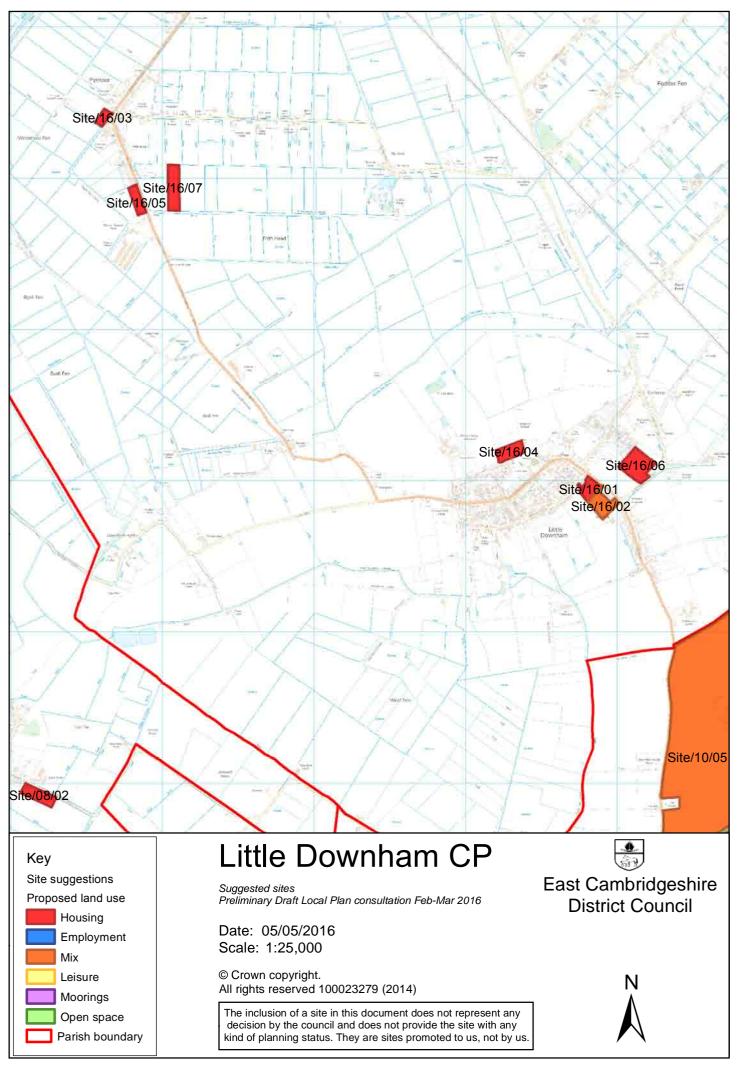
# **Appendix 2: East Cambridgeshire Call for Sites (2016)**

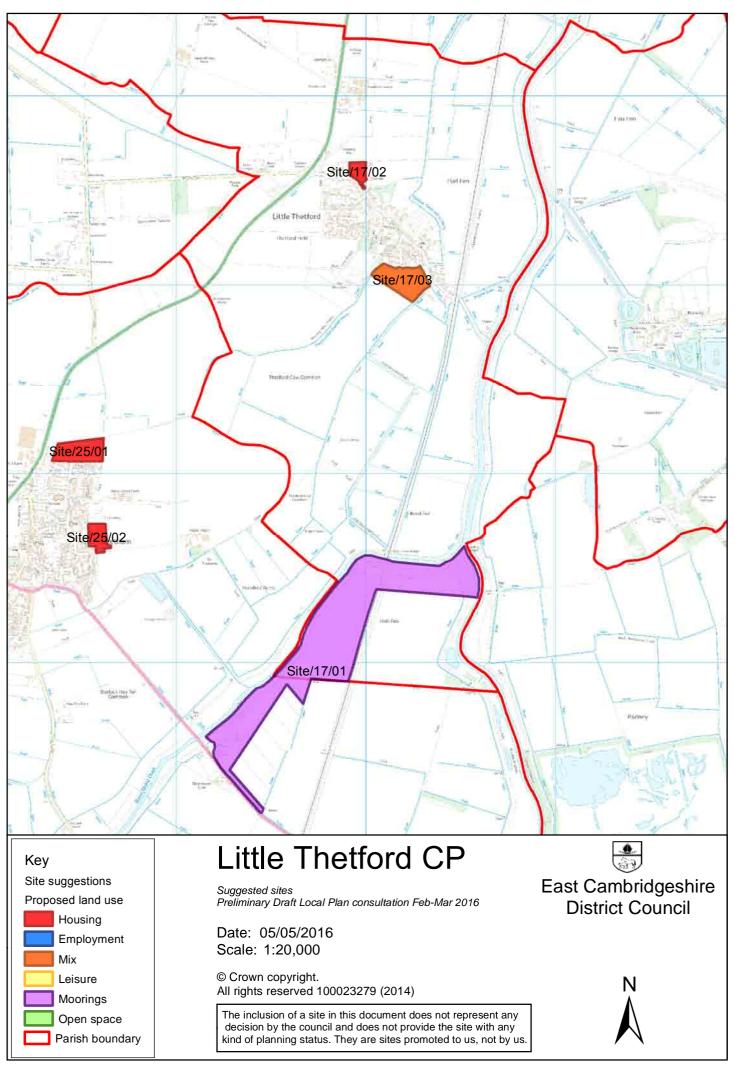


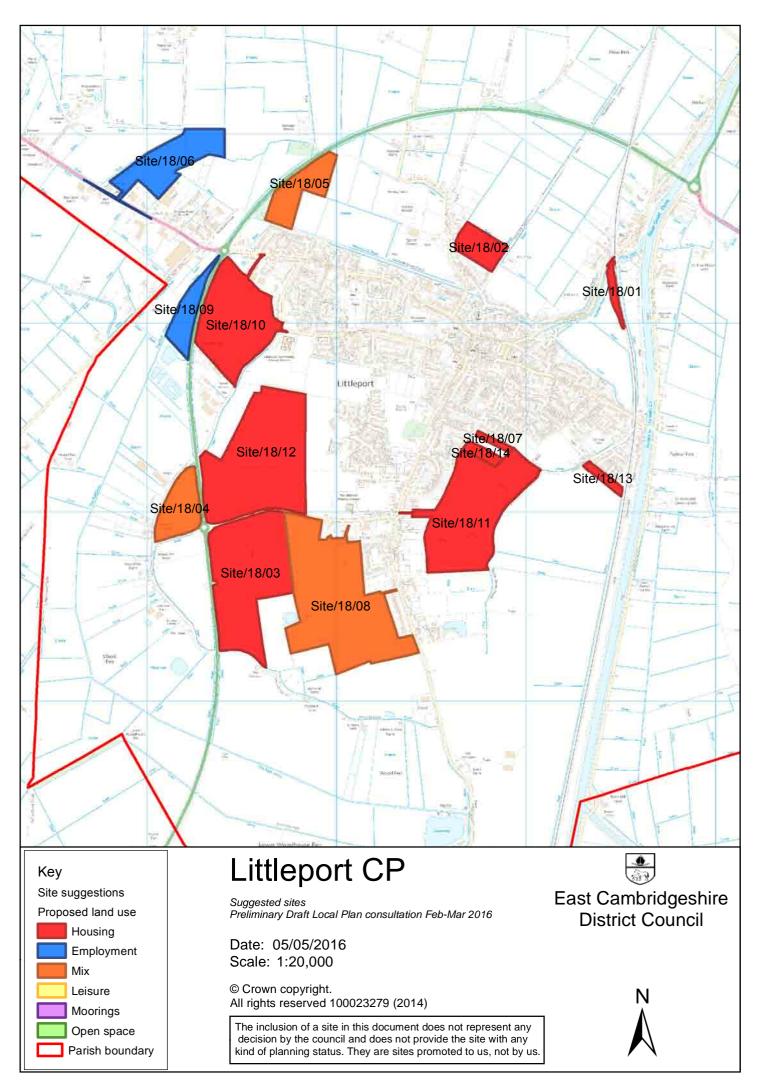


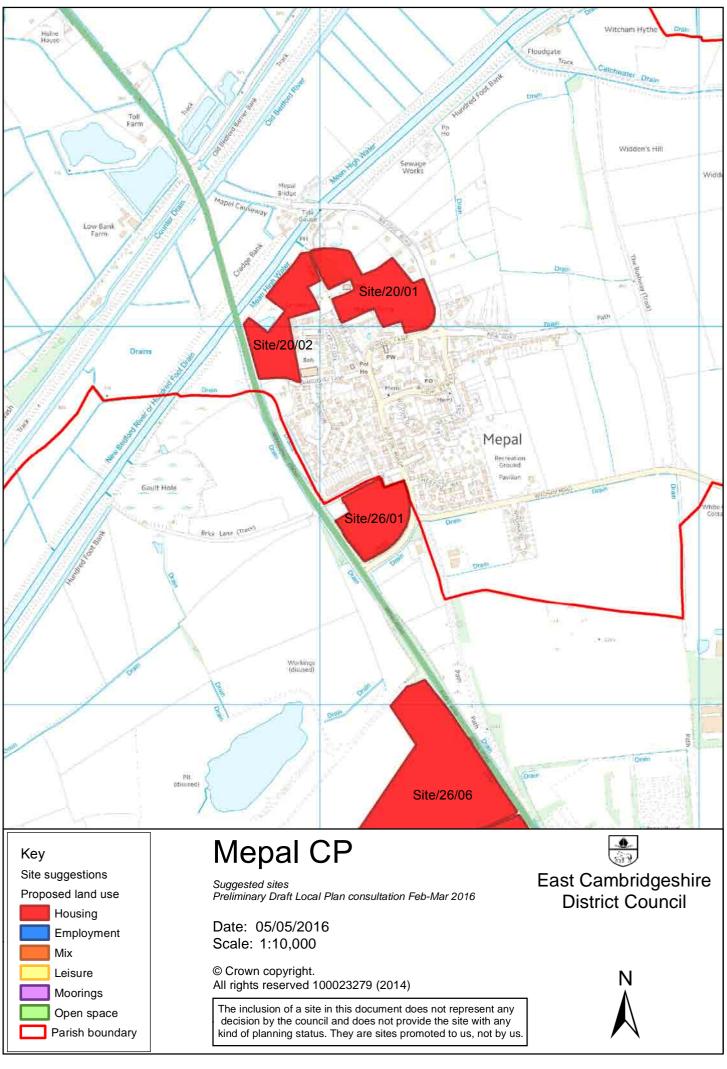


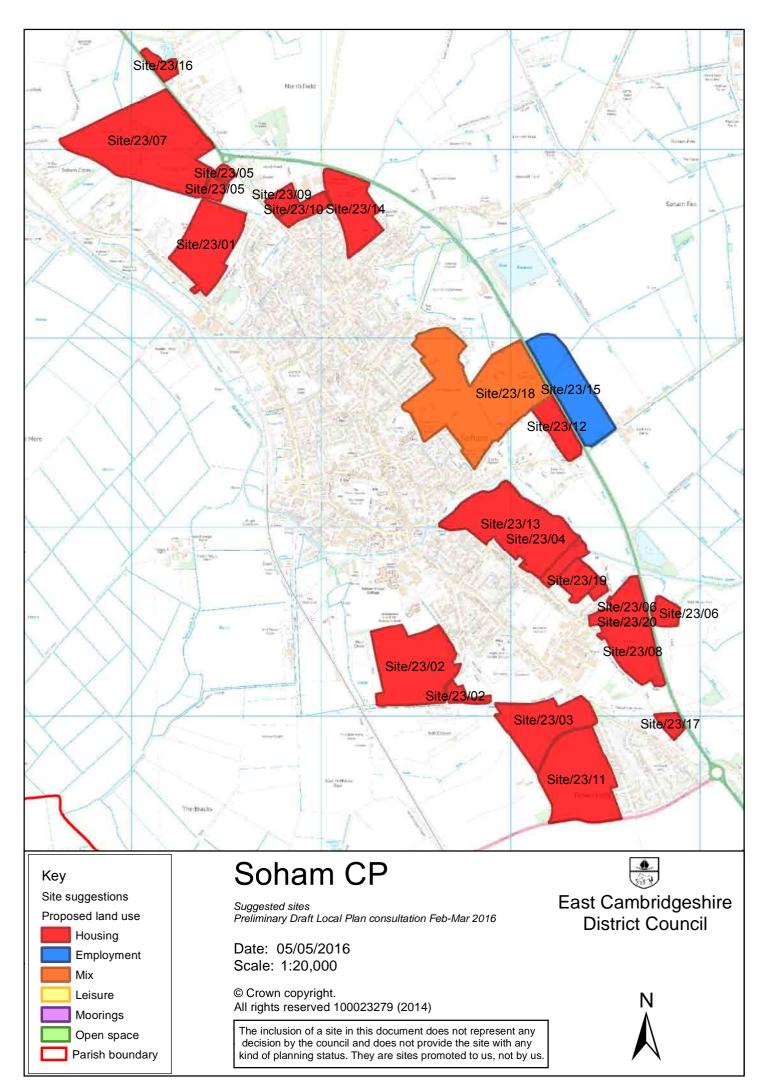


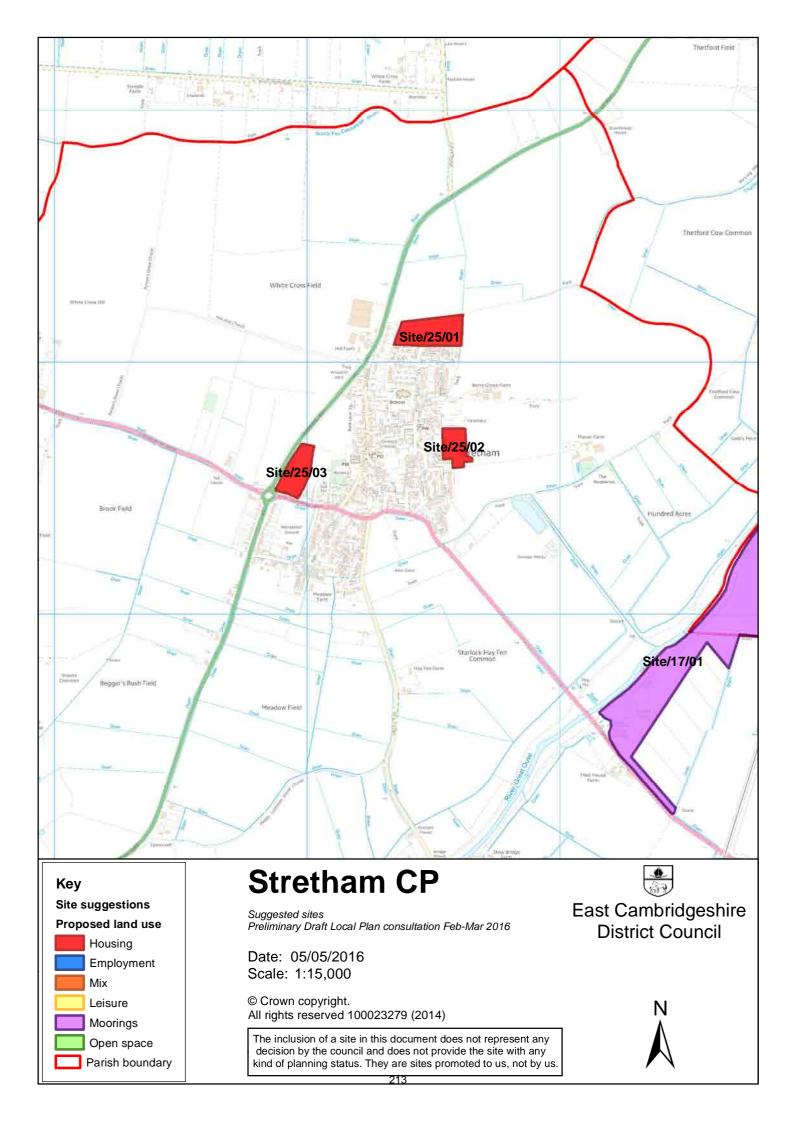


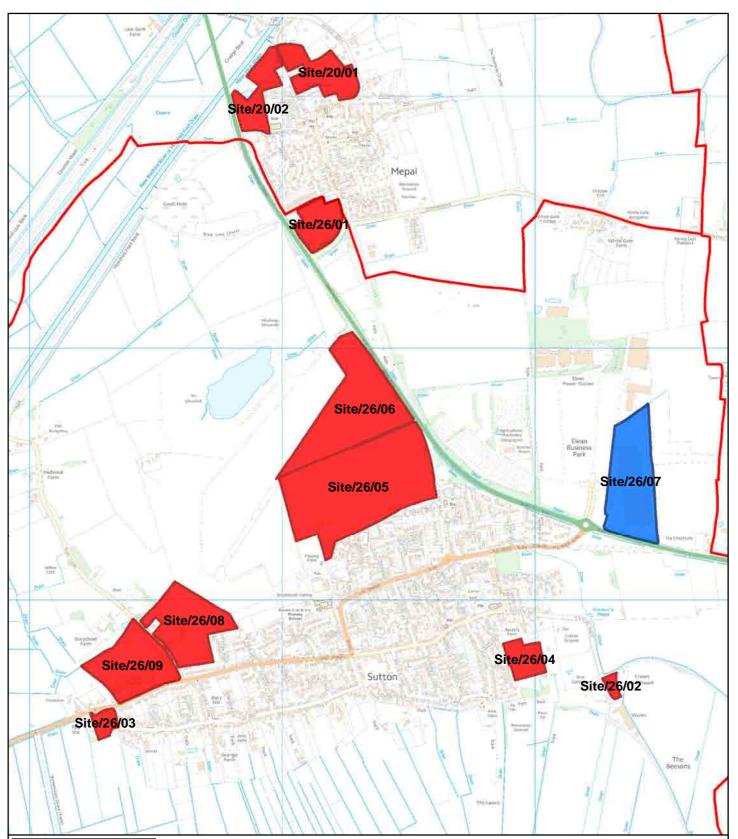












#### Key Site suggestions Proposed land use Housing Employment Mix Leisure Moorings Open space Parish boundary

# **Sutton CP**

Suggested sites Preliminary Draft Local Plan consultation Feb-Mar 2016

Date: 05/05/2016 Scale: 1:15,000

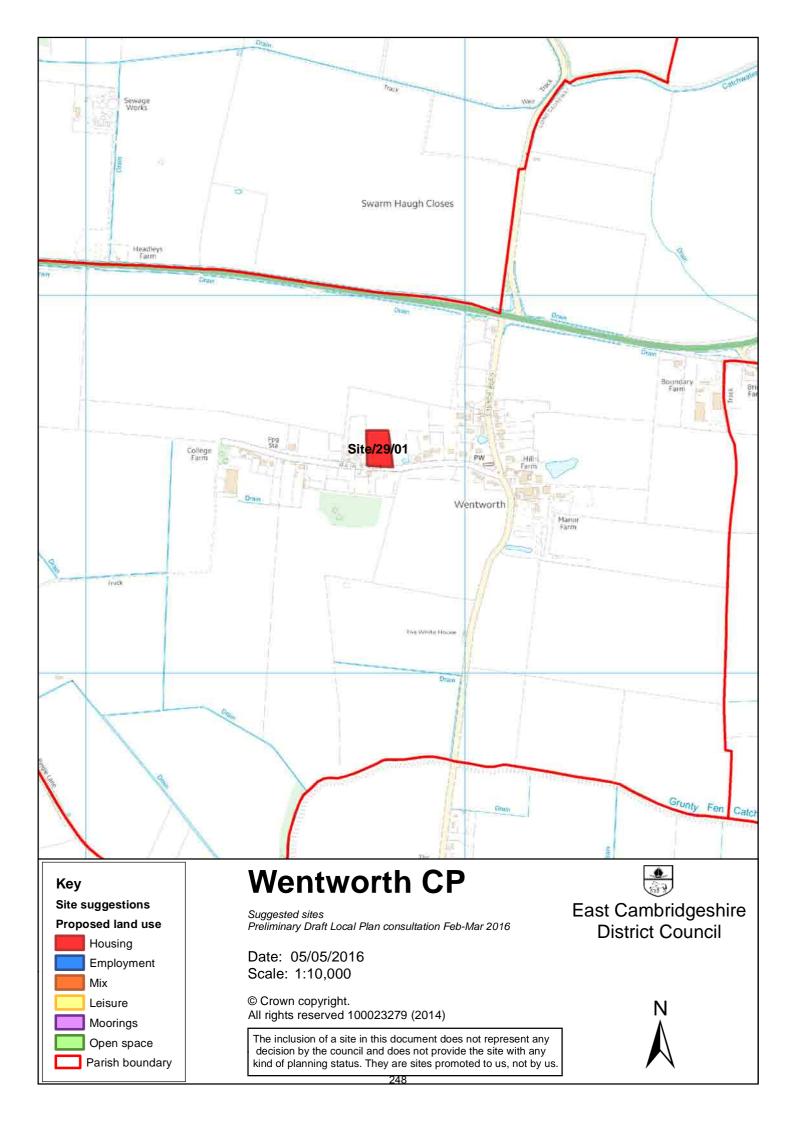
© Crown copyright. All rights reserved 100023279 (2014)

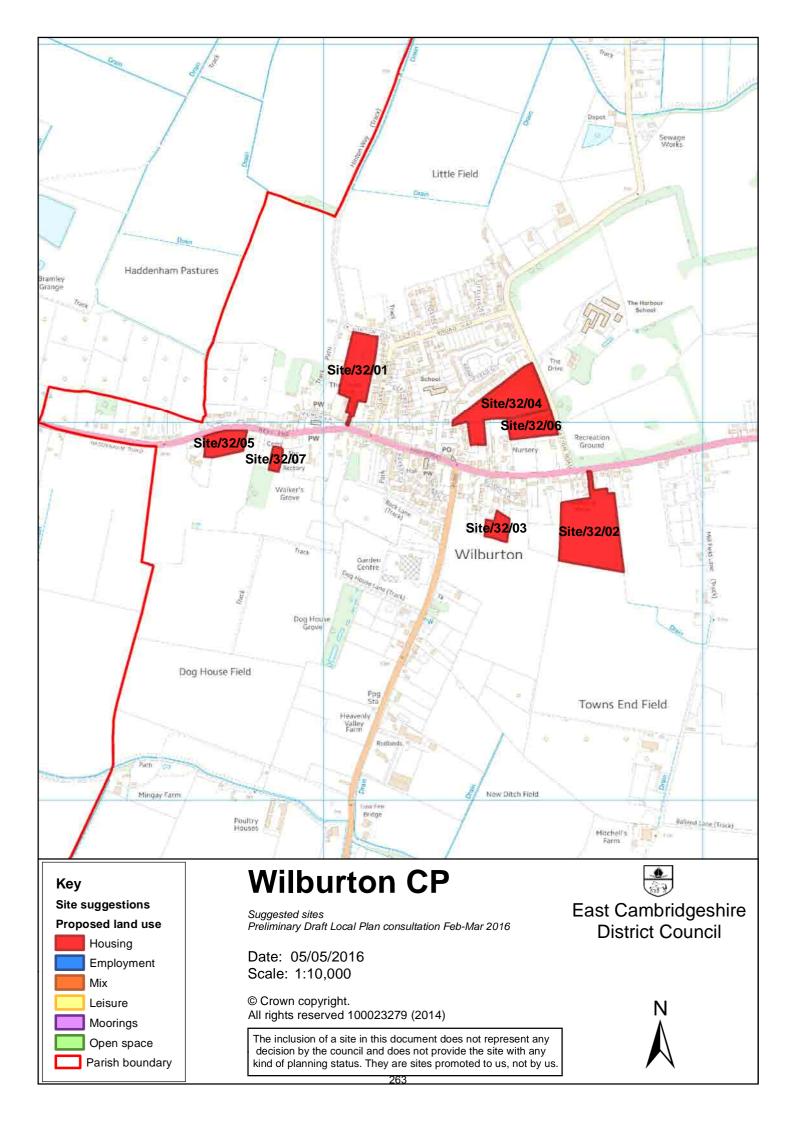
The inclusion of a site in this document does not represent any decision by the council and does not provide the site with any kind of planning status. They are sites promoted to us, not by us.

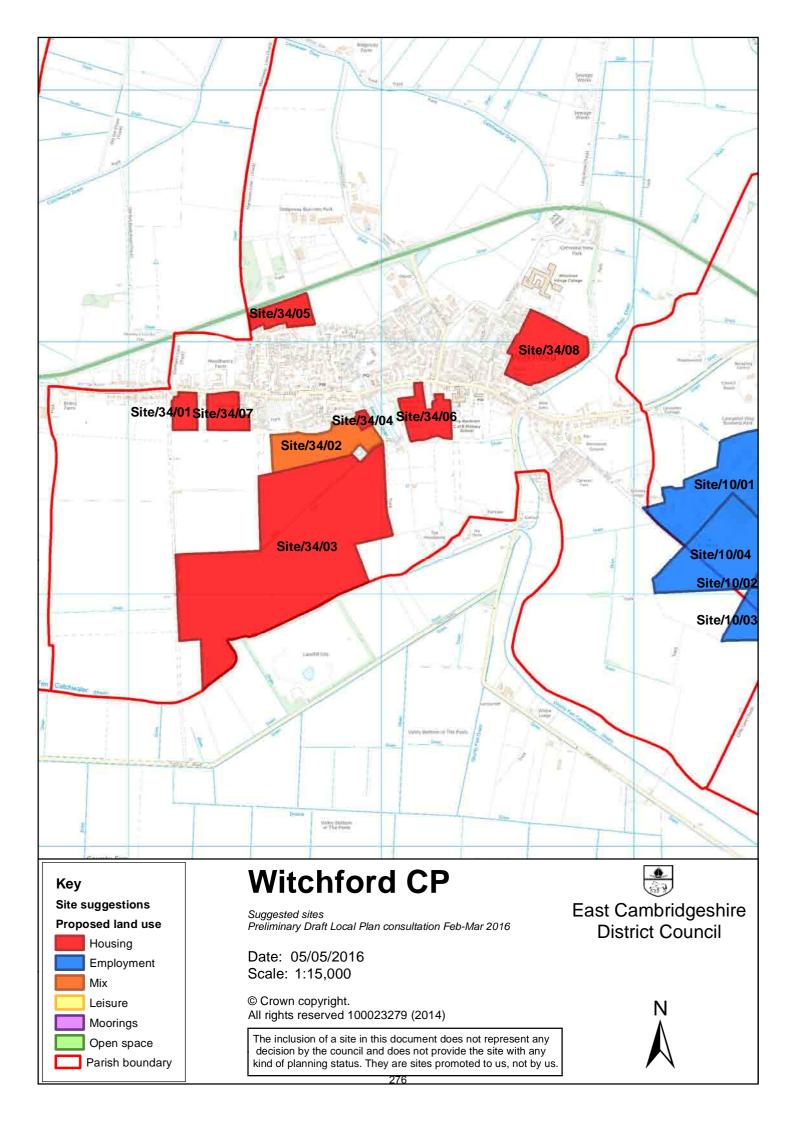
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East Cambridgeshire District Council



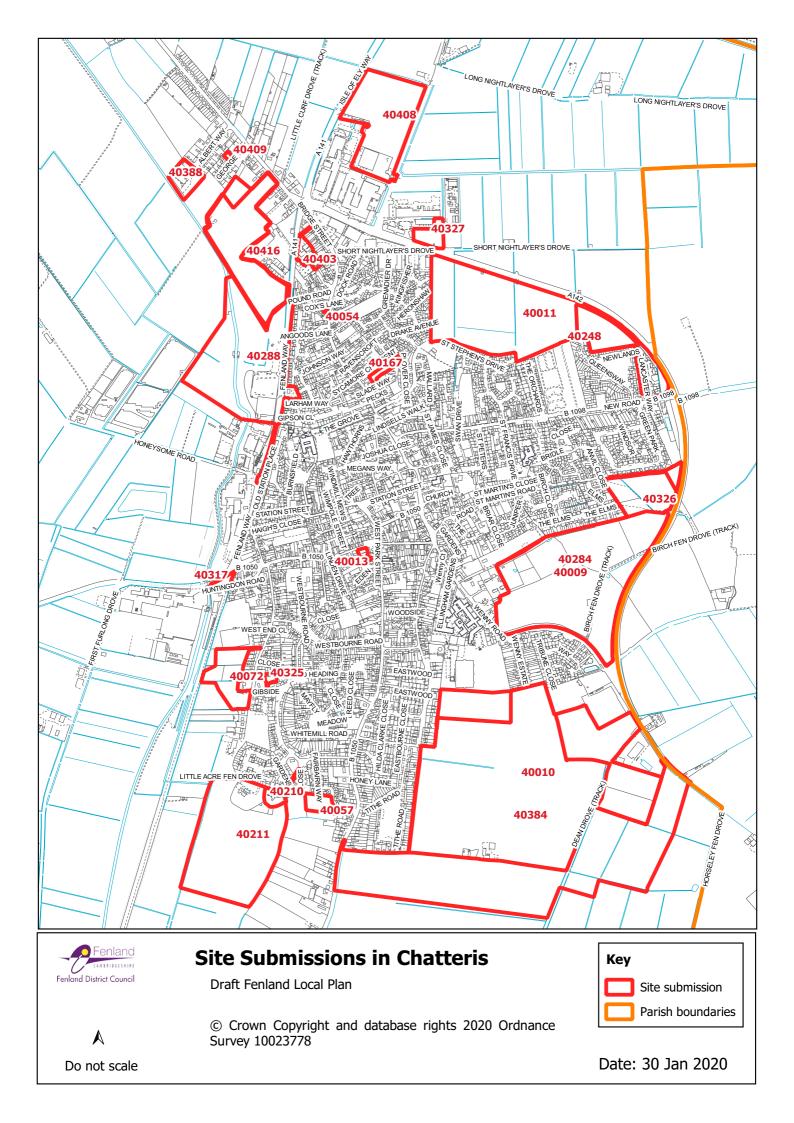








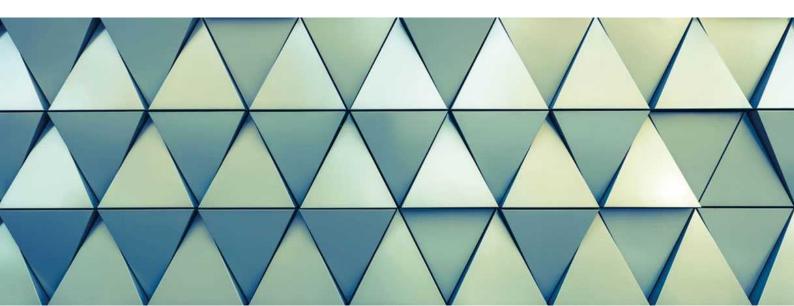
## Appendix 3: Fenland SHELAA (2020) map



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