

CONSULTATION FROM FENLAND DISTRICT COUNCIL ON 'FENLAND COMMUNITIES DEVELOPMENT PLAN – CORE STRATEGY'

To: **Cabinet**

Date: **27 September 2011**

From: **Executive Director: Environment Services**

Electoral division(s): **Chatteris; Forty Foot; March East; March North; March West; Roman Bank and Peckover; Waldersey; Whittlesey North; Whittlesey South; Wisbech North; Wisbech South**

Forward Plan ref: **N/a** *Key decision:* **No**

Purpose: **To consider the proposed County Council response to consultation from Fenland District Council on the 'Fenland Communities Development Plan – Core Strategy'.**

Recommendation: **Cabinet is asked to:**

- a) Assess and comment on the draft response set out in Appendix 3**
- b) Delegate to the Cabinet Member for Growth and Planning in consultation with the Executive Director: Environment Services the authority to amend the response before submission to Fenland District Council.**

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1. INTRODUCTION

- 1.1 This report highlights the current consultation from Fenland District Council on the 'Fenland Communities Development Plan – Core Strategy' draft consultation.
- 1.2 The views of Cabinet are sought on the draft response. Cabinet is asked to delegate the authority to amend this response to the Cabinet Member for Growth and Planning in consultation with the Executive Director: Environment Services.
- 1.3 A draft response will be submitted to Fenland District Council by their deadline of 23 September. This will then be followed up by any amendments following the Cabinet meeting on 27 September, with the final response then being submitted to the District Council.

2. BACKGROUND

- 2.1 Fenland District Council is currently consulting on a draft Core Strategy for the District. The consultation highlights that most Core Strategies are very long documents that take years to prepare; the District Council has decided to prepare a much shorter draft strategy focussing on key issues, which is designed to be more flexible. The draft Core Strategy is available to view at:

<http://fenland.newgrove.com/>

- 2.2 The proposals in the draft Core Strategy are based on the findings of a number of evidence documents available to view from the District Council's website at:

<http://www.fenland.gov.uk/article/3332/Evidence-Documents>

The 'Shaping Fenland Together' project has been of particular importance in the preparation of the draft Core Strategy. This has now been renamed 'Fenland Neighbourhood Planning Vision' and two reports are available to view on the Council's website. The Core Strategy is seen as an important tool to help deliver the Fenland Neighbourhood Planning Vision. The Vision concludes that, to help address the District's challenges, it is essential that high levels of growth are promoted and enabled. Through growth, the Vision argues, issues such as deprivation, the shortfall in infrastructure and low skills can start to be addressed. In addition, growth will attract investment, businesses and new residents to the District.

- 2.3 Following consultation on the draft Core Strategy, there will be a further opportunity for comment on a proposed Submission document in January 2012. Given this, the nature of our comments on this draft are intended to provide clarity on the key issues that need addressing ahead of the Submission draft, and as such we need to strike a tone of working together with Fenland District Council to get the right answers ahead of finalising the Strategy. After the Submission draft Strategy is consulted upon, the District Council intend to submit the Core Strategy to Government. This will be followed by an Independent Examination by a Planning Inspector. The District Council intends to adopt the Core Strategy by the end of 2012.

3. FENLAND COMMUNITIES DEVELOPMENT PLAN – CORE STRATEGY

- 3.1 The Strategy's vision for Fenland is that, between 2011 and 2031, the area will be a high growth district with a high level of housing growth, increased employment opportunities and new infrastructure and facilities. (The full vision is provided in Appendix 1.)
- 3.2 The draft sets out a range of housing growth to be delivered over the 20 year period, from a minimum of 11,000 to a maximum of 16,000 (averaging from 550 to 800 new homes a year). The great majority of new housing is to be directed to the market towns of Wisbech, March, Chatteris and Whittlesey, with most development concentrated in the Primary Market Towns of March and Wisbech.
- 3.3 The broad locations and scale of growth are set out for each of the market towns for five year periods to 2031 (see Appendix 2). However, no housing numbers or phasing details are given for individual sites. The draft Core Strategy states that, for the foreseeable future, the District Council is not intending to allocate specific sites for housing on an Ordnance Survey (OS) based map, but prefers a more flexible approach, with site boundaries being determined through the masterplan or planning application process.
- 3.4 The Core Strategy recognises that housing growth in Fenland has historically not matched job growth and that almost 40% of Fenland's working population commute out of the District for work. The District Council calculates that at least 125 hectares of employment land will be needed to support the housing growth, meet projected labour demand and provide flexibility and choice of sites. Most of this is expected to be provided through sites that currently have planning permission and remaining allocations, with the remainder coming forward through the masterplanning process in the market towns.
- 3.5 The Core Strategy sets out 14 strategic policies, which establish the spatial strategy and settlement hierarchy for the District, respond to housing need by requiring between 20 and 30% affordable housing as part of new developments and provide guidance for new employment and retail development.
- 3.6 A series of policies are given for the four market towns, with new development concentrated in urban extensions at:
- *Wisbech* – to the east (50 hectares), south (60 hectares) and west (150 hectares)
 - *March* – to the north-east (30 hectares), south-west (no size given), south (no size given) and east (30 hectares)
 - *Chatteris* – to the south east (20 hectares) and south (60 hectares)
 - *Whittlesey* – to the east (no size given).
- 3.7 The policy for Whittlesey also sets out criteria which would be used to judge any application for the development of a Regional Freight Interchange – proposals are for a large site to the west of the town, most of the development being within the administrative area of Peterborough.

- 3.8 Other policies in the Core Strategy set out guidance for development in the rural area, delivering infrastructure, responding to climate change and managing the risk of flooding, delivering more sustainable transport and creating a high quality environment as part of new developments.
- 3.9 When adopted, the Core Strategy will replace all of the existing policies in the Fenland Local Plan and saved policies in the Cambridgeshire and Peterborough Structure Plan.

4. COMMENTARY

- 4.1 The draft Core Strategy provides a succinct document that appears to reflect the new approach being advocated by Government in publications such as the draft National Planning Policy Framework (considered as a separate report to this Cabinet meeting). The Strategy sets out a high level of housing and employment growth which is intended to transform the District and improve the lives and opportunities of its residents.
- 4.2 As Members may recall, in responding to the review of the Regional Spatial Strategy (RSS) in 2009-10 the Cambridgeshire authorities undertook an extensive assessment - the Cambridgeshire Development Study (July 2009) - that examined options for the future growth of the County to 2031.
- 4.3 Following this, a position statement was agreed by the Cambridgeshire authorities in December 2009 that set out proposed levels of growth for the County to inform the review. For Fenland provisional figures of 11,000 to 14,000 new homes were set out for the period from 2011 to 2031. The position statement added that any further increase would need to be dependent on a study of the potential for regeneration of the market towns, infrastructure improvements (including road and rail), and the possible scale of job growth to reduce dependence on out-commuting.
- 4.4 The draft Core Strategy sets out potential growth of between 11,000 and 16,000 new homes over the period between 2011 and 2031, broadly within the range being considered at the time of the Regional Spatial Strategy Review, but based on more recent evidence set out in the Fenland Neighbourhood Planning Vision Study.
- 4.5 A draft County Council response is set out in Appendix 3 below. This broadly supports the approach undertaken by the District Council to provide a succinct and overarching framework for growth for the longer-term and to focus such growth on market towns and key centres. The response also argues the need for greater recognition that levels of growth in better connected places like March and Whittlesea may differ from that in less well connected places like Chatteris and Wisbech. This helps to ensure that maximum use is made of existing infrastructure and assists in reducing the need to travel through provision of sustainable travel infrastructure. There will be need for clarity that the highway infrastructure within the market towns and on the major routes in the district has the capacity to cope with the traffic generated by such new developments and that job growth can keep pace with housing growth.

- 4.6 The response also highlights the need to provide a clear link between growth and infrastructure provision to ensure that the key infrastructure dependencies are highlighted up front and early to help ensure that the development can be properly planned and successfully delivered. In this regard there needs to be clarity regarding what strategic infrastructure is needed in order for the key parcels to come forward and some clarity regarding costs of such key infrastructure to provide some clarity on viability and deliverability. The infrastructure deliverability needs better consideration in the Strategy and the absence of the Shaping Fenland Stage 3 Report on Infrastructure Planning or links to the existing Cambridgeshire IDP makes it difficult to judge whether or not supporting infrastructure can be delivered and the timing of this.
- 4.7 It is recommended that the Proposals Map includes the key infrastructure and designations and other key policy constraints/ opportunities.
- 4.8 Further clarity would be helpful regarding the likely phasing of developments and indeed how development can be adequately controlled to avoid a piecemeal approach without the necessary supporting infrastructure. The current approach is flexible and there are risks, particularly when combining this more flexible approach locally with a greater focus on approving development anticipated through national policy via the draft Framework (which is also being considered at this meeting). The potential consequences of piecemeal development could impact on quality of life locally. This could lead to difficulties in providing necessary services and increased costs associated with infrastructure which may not be affordable, as developer contributions are likely to be less, unless properly planned for as part of an overarching master planning approach. Therefore, there will be a need for clear guidance in terms of approach and process for Masterplanning, to make clear what is expected from the developers, and what can be expected from the local authority in terms of guidance on key principles, approach, and support.
- 4.9 A more integrated spatial approach would be beneficial to demonstrate how the proposed development can help to secure the vision and ambitions outlined in the Fenland Neighbourhood Planning Vision. Further clarity on the link between growth and reducing deprivation and increasing opportunities would also be helpful to see. There is also a need for greater reference to promoting a sequential approach to development to ensure a sustainable planned approach to developing the Market towns and key centres. While the Masterplanning approach should help to secure this, it is considered that stronger policy requirements are needed within the core strategy to help direct future growth to places where the benefits of growth such as improved infrastructure and employment opportunities can help to improve the environment and quality of life of residents. This also relates to the need to ensure that policies should actively manage patterns of growth to make the fullest use of public transport, cycling and walking.
- 4.10 Deliverability of the Core Strategy is a key issue which is tested at examination, and in developing the plan and policies further, it would be useful to see more clarity as to how the vision (relating back to the shaping work), objectives and strategy for the area are expected to be delivered and by whom, and when. This includes making it clear how infrastructure which is

needed to support the strategy will be provided based on sound infrastructure delivery planning and should include ensuring that there are not regulatory or national policy barriers to the delivery of the strategy.

- 4.11 A stronger link needs to be demonstrated between the ability to deliver employment growth and the relationship with housing numbers. This is particularly the case where numbers projected are above RSS levels.
- 4.12 It would be helpful if the Strategy included more clarity on how housing growth will help to deliver increased job opportunities locally and reduce out-commuting and help in achieving the vision for the district. It would also be helpful to see more on how delivering housing growth will help to deliver jobs, e.g. if the numbers of homes being provided doesn't deliver the related numbers of jobs, will this trigger a review of the Strategy to ensure that future growth continues to be sustainable?
- 4.13 Comments are also given regarding the impacts of the Core Strategy proposals on education provision. The County Council's Research Group has assessed the implications of the proposed housing growth on pupil forecasts. This work gives an indication of the scale of provision that will be necessary under the scenarios set out in Appendix 2. The results of this work are set out in Appendix 3, paragraphs 27 to 34.
- 4.14 Support is given for the Core Strategy's approach to the natural and historic environment and suggestions are made as to how policies could be improved.

5. NEXT STEPS

- 5.1 As outlined above, a draft response will be submitted to Fenland District Council, to be followed by the final County Council response following Cabinet on 27 September. There will be a further opportunity to comment on the Proposed Submission Draft Core Strategy in January 2012.
- 5.2 Officers from Fenland District Council have met with County Council officers to discuss the issues arising from the proposals in the Core Strategy. It is important that the County Council continues to work closely with the District Council, providing support and advice in developing the plan through to the next stages and in planning for the new developments as they come forward through the planning process.

6. ALIGNMENT WITH PRIORITIES AND WAYS OF WORKING

Supporting and protecting people when they need it most / Helping people to live independent and healthy lives in their communities

- 6.1 The Core Strategy sets out a number of policies that will be used to secure community infrastructure and services as part of new developments.

Developing our local economy for the benefit of all

- 6.2 The Core Strategy promotes a high level of growth for the District. The vision is that *“There will be increased employment opportunities across the District, such as in emerging new ‘green’ economies and a bolstered tourism economy.”*

Ways of working

- 6.3 The County Council is identified as a key partner that will help deliver the Strategy *“as the authority on highways, social services, education, green infrastructure, minerals and waste”* (page 59). The preparation and adoption of the Core Strategy will support the County Council’s ways of working through:
- Helping provide services and community facilities – *Making sure services are provided in the right way*
 - Promoting closer working between public bodies – *Working together*

7. SIGNIFICANT IMPLICATIONS

Resource and Performance Implications

- 7.1 The Core Strategy will have a number of implications for resources and performance. High levels of growth will place demands on County Council services. Policies in the Strategy - including CS5 (Urban Extensions), policies CS6 to CS9 for the market towns and CS11 (Supporting and Managing the Impact of a Growing District) – are intended to secure gains from development to mitigate these impacts.

Statutory, Risk and Legal Implications

- 7.2 When adopted, the Core Strategy will be part of the development plan for the District and will be used to decide planning applications. There are risks associated with a more flexible approach, including potential for appeals and that development may come forward in a more fragmented way which could impact on service delivery requirements and infrastructure.

Equality and Diversity Implications

- 7.3 The Core Strategy promotes growth in the District to realise benefits for local people. The vision is that *“Everyone will recognise the increase in opportunities presented to them, whether that be new homes, a wide range of new job opportunities or places to play.”*

Engagement and Consultation

- 7.4 The County Council is being consulted on the draft Core Strategy by Fenland District Council. Comments have been sought from a wide range of Council service areas and those received have been incorporated into the draft response. Local Members were also contacted to seek views on the Strategy.

Source Documents	Location
<ul style="list-style-type: none"> • Fenland Communities Development Plan – Core Strategy Draft Consultation • Fenland Neighbourhood Planning Vision Study – Stage 1 Report • Fenland Neighbourhood Planning Vision Study – Stage 2 Report • Fenland Neighbourhood Planning Vision Study – Appendices • Cambridgeshire Development Study Final Report (July 2009) 	<p>Development Strategy, CC1216, 2nd Floor 'A' Wing, Castle Court</p> <p>Also available to view from:</p> <p>http://fenland.newgrove.com/</p> <p>http://www.fenland.gov.uk/article/3332/Evidence-Documents</p>

Appendix 1: Fenland Core Strategy Vision Statement

Fenland will nurture, grow and promote its market towns and villages. They will be attractive places to live, set within our unique and protected Fens landscape.

Everyone will recognise the increase in opportunities presented to them, whether that be new homes, a wide range of new job opportunities or places to play.

Between 2011 and 2031, Fenland will be a high growth district, growing by between 11,000 and 16,000 new homes, meeting the housing needs of all our communities. There will be increased employment opportunities across the district, such as in emerging new 'green' economies and a bolstered tourism economy. Growth in homes and jobs will be closely linked to each other, with new infrastructure such as schools, roads and open space provision planned and provided at the same time as the new buildings.

Growth will be focussed on our four market towns, but villages will not be left behind with appropriate and sensitive development being permitted there to ensure they remain thriving local communities.

Appendix 2: Main Locations and Targets for Housing Growth
(From Draft Core Strategy Policy CS2 – Growth and Housing)

For each of the main locations, and for each five year period of this plan, the approximate minimum and maximum targets are:

	Cumulative Total		Wisbech		March		Chatteris		Whittlesey		Other locations	
Year	Min	Max	Min	Max	Min	Max	Min	Max	Min	Max	Min	Max
2011-16	2650	2900	1100	1100	550	700	350	450	350	350	300	300
2016-21	3150	4450	1350	1400	1000	1450	450	850	250	450	100	300
2021-26	3150	4800	1200	1350	1100	1650	250	700	450	750	150	350
2026-31	1900	4050	700	1200	750	1700	100	400	200	400	150	350
Total	10850	16200	4350	5050	3400	5500	1150	2400	1250	1950	700	1300

Proposals which come forward which fall within, at the point of approval, the trajectory to achieve the minimum target ('the minimum trajectory') will be assessed on the basis of the policies of this Core Strategy.

Appendix 3 – Draft Count Council Response

‘Fenland Communities Development Plan – Core Strategy’ Proposed Comments from Cambridgeshire County Council

General Comments

1. The County Council welcomes the opportunity to comment on the draft ‘Fenland Communities Development Plan – Core Strategy’ and to be involved in its preparation. Overall this is a succinct, easy to follow document, which helps to explain the broad breadth of the policies suggested, and appears to have clear links to the emerging National Planning Policy Framework approach.
2. The County Council is supportive of the Strategy’s aim to provide a succinct and overarching framework for growth for the longer-term and to focus such growth on market towns and key centres. This helps to ensure that maximum use is made of existing infrastructure and assists in reducing the need to travel through provision of sustainable travel infrastructure. There will be need for clarity that the highway infrastructure within the market towns and on the major routes in the district have the capacity to cope with the traffic generated by such new developments. In this regard we would like to work with Fenland to consider whether there needs to be greater recognition of the growth prospects in the Strategy, particularly for those Market towns which have better existing connectivity than those with weaker connectivity and the consequent differential prospects for jobs growth or access to wider labour market areas.
3. Further clarity on the link between growth and infrastructure provision is needed and key infrastructure dependencies should be highlighted up front and early to help ensure that development can be properly planned and successfully delivered. In this regard there needs to be clarity regarding what strategic infrastructure is needed in order for the key land parcels to come forward and costs of such key infrastructure to provide some clarity on viability and deliverability. The infrastructure deliverability needs further development including evidence to demonstrate that the overall plan is achievable. For example, in relation to development at March, it is understood that there is no spare capacity in the sewerage system and the timing of the different urban extensions is likely to be dependent on upgrades to waste water infrastructure. In this regard it would be helpful to see Shaping Fenland Stage 3 Report on Infrastructure Planning to help ascertain whether or not supporting infrastructure can be delivered and likely timing. The County Council could work with Fenland to review this supporting information to provide advice on approach if that would be helpful.
4. The Council considers that the Core Strategy should set out a clear sequential approach to the development of sites, covering issues such as which sites need to come forward first, where there is critical infrastructure that must be delivered before development can begin and how the development of several sites at the same time is likely to affect the strategic infrastructure network. It is considered that a sequential approach to site development would provide more certainty for local communities, local authorities, infrastructure and utilities providers and developers alike. It would also make it easier to resist the development of alternative sites that could undermine the Strategy’s objectives.

5. Further clarity on how development can be adequately controlled to avoid a piecemeal approach would be helpful. The current approach is flexible and there are risks, particularly when combining this more flexible approach locally with a greater focus on approving development anticipated through national policy via the draft Framework. The potential consequences of piecemeal development could impact on quality of life locally. This could lead to difficulties in providing necessary services and increased costs associated with infrastructure which may not be affordable, as developer contributions are likely to be less, unless properly planned for as part of an overarching master planning approach. Therefore, clear guidance in terms of approach and process for Masterplanning would be helpful, to make clear what is expected from the developers, and what can be expected from the local authority in terms of guidance on key principles, approach, and support.
6. It would be helpful if the Core Strategy establishes how the policies are intended to address deprivation. As the Fenland Neighbourhood Planning Vision makes clear, the District has problems of high deprivation, particularly in north Fenland, with strong links between deprivation and poor health. The Strategy needs an overarching section setting out how the growth will bring about improvements to the lives of local people. As the Neighbourhood Planning Vision highlights, *“The key consideration throughout the process of planning for growth must be ‘what is the community deal?’ i.e. how will residents and businesses benefit?”*
7. It would be beneficial to readers of the document if major sites with existing planning permissions were highlighted within the document for those without detailed knowledge. This would be especially helpful in relation to the proposed urban extensions, particularly if any of those being identified for development in the early period were formed, either totally or in part, by existing permissions. This would support ongoing County Council service planning considerations in response to this strategy.
8. Reference is made in **paragraph 6.1.4** to a proposals map being produced. It would be helpful for readers if a proposals map is included that shows major proposals, including the urban extensions and Regional Freight Interchange, environmental constraints, including flood risk, the key infrastructure constraints and the infrastructure improvements that will need to be provided for the successful implementation of the Strategy. It would be helpful for readers if this was presented at the start of the document to put the policies and proposals in context.
9. A more integrated spatial approach would be beneficial to demonstrate how the proposed development can help to secure the vision and ambitions outlined in the Fenland Neighbourhood Planning Vision. There is also a need for greater reference to a sequential approach to help ensure a sustainable planned approach to developing the Market towns and key centres. While the Masterplanning approach should help to secure this, it is considered that stronger policy requirements are needed within the core strategy to help direct future growth to places where the benefits of growth such as improved infrastructure and employment opportunities can help to improve the environment and quality of life of residents. This also relates to the need to ensure that policies should actively manage patterns of growth to make the fullest use of public transport, cycling and walking.

10. Deliverability of the Core Strategy is a key issue which is tested at examination, and in developing the plan and policies further, it would be useful to see more clarity about how the vision (relating back to the shaping work), objectives and strategy for the area is expected to be delivered and by whom, and when. This includes making it clear how infrastructure which is needed to support the strategy will be provided based on sound infrastructure delivery planning and should include ensuring that there are not regulatory or national policy barriers to the delivery of the strategy.

Section 2: Spatial Portrait, Key Issues, Our Vision and Our Objectives

Vision

11. Residential and economic development in Fenland will need to provide new infrastructure for all transport modes not just roads, and it would be helpful to see this reflected in the vision statement.

Section 2.5: Our objectives

12. The County Council welcomes the recognition of the importance of the historic environment, and its inclusion in Objectives 3.1, 3.2 and 3.3. The Council also welcomes the recognition of the importance of the historic environment to the character and distinctiveness of Fenland's historic settlements, including the exceptional built heritage of Wisbech (3.2.3), the historic urban form of March (3.3.1) and the rich mix of historic properties in Chatteris (3.4.1).
13. The Council welcomes the inclusion of an objective to *"Create and enhance multifunctional open space that is accessible, links with a high quality green infrastructure network and improves opportunities for people to access and appreciate wildlife and wild places"* (6.2). The Council would strongly support the inclusion of Green Infrastructure into policies throughout the Core Strategy to help achieve this objective and it would be helpful if reference could be made to the Green Infrastructure Strategy for Cambridgeshire.

Section 2.9: Housing growth and meeting housing need

14. Regarding **Policy CS1** in terms of transport, the Council supports the majority of the growth being delivered in the market towns as this will enable the best use of the existing infrastructure available, and also assist in reducing the need to travel through provision of sustainable travel infrastructure. Also it needs to be ensured that the highway infrastructure within the market towns and on the major routes in the district have the capacity to cope with the traffic generated by the new developments.
15. Regarding policy **CS2 (Growth and Housing)**, it is unclear whether the housing figures are intended to include existing housing commitments (allocations and sites with the benefit of planning permission). If not the level of housing could be higher than suggested.
16. A clearer link needs to be demonstrated between the ability to deliver employment growth and how this employment expansion can or should be relied on as a basis for the housing numbers. In this regard, further evidence regarding the housing need (particularly those above RSS levels) needs to be adequately demonstrated. The policy indicates that, where it can be

demonstrated that market conditions warrant additional growth, the Council will be prepared to accept a further 10% increase in the level of housing growth set out in the maximum targets for each settlement(s). To some extent this would be consistent with the Government's recently published draft National Planning Policy Framework which requires local plans to include an additional allowance of *at least* 20% as part of the identified housing supply.

17. It is unclear what is meant by the term 'Other locations' where it is assumed that 700-1,300 dwellings will be delivered between 2011 and 2031; for example whether this is intended to refer to limited growth and small villages as suggested in policy CS1. Policy CS10 (Rural Areas Development Policy) implies that development at settlements outside the market towns will be acceptable if it is consistent with policies CS1 and CS2 together with the criteria in policy CS12 (Responding to Climate Change and Managing the Risk of Flooding in Fenland).
18. It will be essential that housing development is closely linked to increased employment opportunities, if the current level of out-commuting is to be reduced or to recognise that sustainable out-commuting by rail may offer different prospects for March and Whittlesea compared to Wisbech and Chatteris. The development of employment land will need to be closely monitored and if the pace of jobs growth is slower than expected, the District Council should consider an early review of the Strategy to assess whether the level of housing growth is still appropriate. It is suggested that trigger points are set out in the Implementation and Monitoring Framework for policy CS4 (Employment and Retail) to guide this process.
19. Given the high levels of growth proposed in the Strategy, it will be essential that new development is properly coordinated with the provision of services and new infrastructure. The Fenland Neighbourhood Planning Vision Study, for example, highlights that recent growth in housing has not been matched with increased employment opportunities and that this has, in part, been responsible for the large volume of traffic on the A1101, A141 and A142. There are also high levels of Heavy Goods Vehicle movements on the A1101, A142 and A47. Internal movements between the market towns account for the demand for additional capacity on the A47(T) and A141, and the Study recognises that this will act as a constraint to development on these corridors unless there are high quality sustainable transport alternatives in place to minimise additional vehicle trips from new sites.
20. It is recognised that *"The purpose of the Core Strategy is not to detail the wide range of infrastructure requirements of the district; rather it is to demonstrate that there is sufficient understanding of the strategic infrastructure requirements that are necessary to deliver the vision for Fenland and to ensure there is a reasonable prospect of the timely provision of this infrastructure"* (paragraph 4.1.4). Nevertheless it is considered that more detail could be provided about the phasing of the individual sites - particularly the urban extensions around the market towns of Wisbech, March, Chatteris and Whittlesey – and how the phasing of these developments will be linked to the provision of essential infrastructure. While there is some detail given about the necessary requirements for each extension, the Core Strategy does not provide information about when these will need to be provided or how the cumulative impact of the development of several sites at the same time may affect the infrastructure of the town, wider District or neighbouring areas.

21. More detail will provide certainty and clarity for developers, the public, service providers (such as the County Council), and infrastructure and utilities providers (particularly regarding waste water infrastructure). As the Core Strategy recognises, *“In some cases the level of growth proposed may not be possible without improvements in supporting infrastructure, particularly utility provision; or one area of growth may not be possible until another linked area has been completed. It may therefore be necessary to phase the delivery of broad locations of growth”* (paragraph 2.9.1).
22. Paragraph (b) - It is suggested that the 3rd bullet point which refers to transport should be changed to read *‘strategic transport issues (rail and road) and local transport issues (access, congestion, junctions, infrastructure for sustainable travel modes and work place and residential travel plans’*
23. In relation to the criteria for assessing housing development proposals the current policy does pick up certain transport elements, however the County will require a transport assessment and associated travel plan for all major developments. The transport assessment will be required to identify the impact of the development on the transport network and identify any mitigation measures that may be required as a result of the development being delivered.
24. It is positive to see that the walking distance to important facilities such as schools will be used in assessing proposals for housing development. However, neither within the policy or the supporting text is there any indication of what would be considered an appropriate distance. It should be noted that for journeys to school, statutory maximums of 2 miles for primary aged pupils up to nine years old and 3 miles for pupils over 9 years old are in operation.
25. The County Council supports the provision of policy **CS3 (Meeting Housing Need)** that seeks affordable housing across development sites. However, it is important to highlight that the level of affordable housing has a marked impact upon demographic forecasts, specifically for child yield. This means that it is likely that higher proportions of affordable housing will have an impact on the scale of education provision that is required to meet the demands arising from each site. This is an important factor to be considered, in terms of individual site viability, and also in relation to alternative mechanisms for developer obligations, specifically if a decision to introduce a Community Infrastructure Levy (CIL) charge is taken.
26. It is unclear how the policy commitment to identify and allocate sites for Gypsy and Traveller provision can be delivered if site specific allocations for housing are not intended to be made for the District. As currently drafted, there are no criteria to determine applications for Travelling Showpeople sites (as the criteria refer to Gypsy and Traveller caravan sites only).

Section 2.10: Employment and retail

27. The County Council strongly supports the objective to encourage economic growth and job creation which meets local employment needs and limits out-commuting, and also the aspiration to broaden the economy and offer a wider choice of job opportunities.
28. The County Council supports the need to provide a choice of land for employment - this is necessary to facilitate a broadening of the economy and to

provide new employment opportunities in places that are sustainable and economically competitive.

29. The County Council supports the commitment to strengthen the role of the market towns, especially March, and to expanding the tourism industry.
30. Regarding policy **CS4 (Employment and Retail)**, it will be central to the successful delivery of the Core Strategy that housing growth is matched by jobs growth. At present the Core Strategy is not clear in setting out what the difficulties are to encouraging economic growth, how these can be overcome, what the market demands are for the location and scale of new employment sites and how the Plan's economic aspirations – for the green economy, tourism and other sectors – will be achieved. Policy CS4 (Employment and Retail) sets out criteria for assessing employment sites, but there needs to be a coherent strategy that establishes how new businesses will be attracted in the targeted sectors and how existing businesses will be supported. For example, policy CS4 deals with tourism and retail development, but no mention is made of the needs of new 'green' businesses, which is an important part of the Core Strategy's vision statement.
31. Policy CS4 could benefit from clarification as to the distribution of employment land planned for. As currently drafted, no indication is given of what the distribution of employment land (at least 125 hectares) is between the urban extensions identified at each of the market towns and potentially elsewhere in the Growth Villages. Similarly no indication is given of the full range of uses this will involve, although it appears to include proposals for office and warehousing / distribution uses. It would be helpful for the planning of services and infrastructure if the Core Strategy was to provide more information.
32. Policy CS4 states that *"the rural economy will be supported by allowing appropriate windfall proposals in the countryside"*. As many existing businesses in Fenland operate outside the main employment sites, support for appropriate extensions to existing buildings in the countryside is welcomed. It is considered that this should be given more prominence, given the current (and foreseeable) economic climate, as retaining and supporting the businesses already located in Fenland is likely to bring more job growth than new businesses to the area. However, as the strategy acknowledges, the successful delivery of other policies will also be critical in delivering these objectives.
33. In relation to the criteria for assessing employment proposals, the current policy does pick up certain transport elements, however the Council will require a transport assessment and associated travel plans for all major developments. The transport assessment will be required to identify the impact of the development on the transport network and identify and mitigation measures that may be required as a result of the development being delivered.

Section 3: Proposals for Places

Section 3.1: Urban extensions

34. Regarding **paragraph 3.1.4**, there is a range of good practice from around the County that can be drawn on in developing the urban extensions into sustainable communities. Experience suggests that early planning to support

the needs of children and families moving into the new homes is particularly important in preventing potentially costly interventions at a later date.

35. The County Council strongly supports policy **CS5 (Urban Extensions)** requiring contributions towards expansion or development of new schools to serve developments. The Council considers it especially positive that the policy sets out that sufficient land will need to be provided to the County Council, at nil cost, to secure this.
36. However, it is unclear from this policy how the impact of a number of urban extension sites which, in combination would require the development of additional school capacity especially at secondary level, would be met. It is questioned how site provision will be determined when a number of developers are involved and the site is to be provided at nil cost. This could have significant viability implications for development sites, if there is no mechanism for offsetting this implication between development sites.
37. This policy may also need to be amended as part of the further development of the Core Strategy to reflect the outcome of the County Council's Post-16 Review, which is expected to be published in Autumn 2011. Reference should also be made to the provision of libraries and lifelong learning services.
38. Regarding education provision, the County Council has undertaken pupil forecasts based on the minimum and maximum levels of growth set out in the Core Strategy. Based on these projections, the County Council will be seeking the following schools and sites to be delivered as part of the Fenland Communities Development Plan. The County Council requests that these requirements are reflected in any subsequent Planning Obligations Strategy to be adopted by the District.

Primary Schools

39. Minimum housing growth target:
 - *Wisbech* – 2 x 2 Form of Entry (2FE) primary schools (each requiring a site of 2.3 hectares)
 - *March* – 1 x 2.5 FE primary school (requiring a 3 hectare site)
 - *Chatteris* – 1 x 1 FE primary school (requiring a 1.5 hectare site)
40. Maximum housing growth target:
 - *Wisbech* – 3 x 2 FE primary schools
 - *March* – 3 x 2 FE primary schools
 - *Chatteris* – 1 x 2.5 FE primary school
 - *Whittlesey* – limited expansion of existing schools may be required
41. All new primary schools will need to include provision for early years and childcare in addition to services for children and families.
42. The response on primary provision reflects the fact that even without further housing growth there is already pressure on capacity in Wisbech and March that has and will require the expansion of existing schools and the provision of new schools. There is no existing spare capacity.

43. In Chatteris there is currently a balance between the number of places available and the demand for places. In Whittlesey there are surplus places but even here at the higher growth levels additional capacity would be required.

Secondary Schools

44. A new secondary school and a site (8 hectares) would be required under the minimum and maximum growth forecasts. The greatest pupil pressures from housing growth, but also from the existing larger primary school cohorts ageing through, are in the Wisbech / March area.
45. Housing growth in March will mean that Neale Wade School will fill from within its own catchment area. This will restrict the current pattern of parental preference under which a number of parents in Wisbech choose to send their children to Neale Wade. This trend, coupled with higher rates of house building in Wisbech (above those in March) suggests that new secondary school provision should be made in Wisbech to ensure that the County Council can meet the overall demand for secondary school places arising from growth throughout Fenland.
46. It would be beneficial if the bullet point in policy CS5 related to open space provision could be expanded to stress that urban extensions will be required to contribute to the development of a network of open spaces and links and the Rights of Way Network. It would also be helpful if this bullet point could also make reference to the Cambridgeshire Green Infrastructure Strategy.
47. Policy CS5 should include reference to how the new communities in the urban extensions will be serviced by public transport and community transport. This will be essential, particularly in the more rural parts of the District, to help tackle deprivation and allow communities access to opportunities. The final bullet point of the policy (referring to market town transport studies) could be expanded to include these considerations.
48. **Policies CS5 (Urban Extensions), CS6 (Wisbech), CS7 (March) and CS8 (Chatteris)** refer to the preparation of town strategies for the market towns and masterplans for the urban extensions. It would be helpful to have more detail concerning these documents, particularly regarding who will have the responsibility of preparing them, what the timescales are for their preparation and what planning status they will have. If they are intended to help secure infrastructure improvements then it will be important that they have sufficient weight in the planning process. The relationship to other work, such as the market town transport studies, also needs to be clarified.

Section 3.2: Wisbech

49. In relation to **paragraph 3.2.1**, the County Council feels that the emphasis that is placed on “*poor educational attainment*” in relation to Wisbech’s poor competitiveness and ability to attract new investment is overstated. Educational attainment is one of many factors which play a role in determining the levels of inward investment in the town, including:
- The quality of transport links
 - Wider investment in structural infrastructure
 - A wider contraction of business distribution across the County

- A decline of agriculture and food processing as part of a general national fall in primary industries
 - The growth of other sectors, specifically finance, services and retail which have generally disadvantaged Fenland.
50. To highlight education in this context is too simplistic a statement, and could undermine the work and efforts of schools to address this. Given this, it is requested that this statement is rewritten to highlight the range of factors that impact on the competitiveness of Wisbech.
 51. In relation to policy **CS6 (Wisbech)**, as outlined above, based on the potential size of development sites proposed, additional secondary school capacity may be required to meet the arising demand. It would be helpful for service planning to have more detail about the size of sites and expected timescales for their delivery.
 52. In line with the comments made in relation to policy CS5, it is unclear what approach would be taken to assessing and securing potential sites for new secondary school provision, should it be needed.
 53. The West Wisbech extension area is situated in close proximity of the River Nene County Wildlife Site. Therefore, specific issues relating to West Wisbech development should include potential impacts on this County Wildlife Site.
 54. The policy for Wisbech does highlight a couple of transport issues for the areas identified for development. However the policy could be enhanced through a reference to the Market Town Transport Strategy. The County Council is aware that the transport modelling has not been completed for Wisbech at present, and therefore the scale of development that can take place in Wisbech and its impact on the transport network, and any required mitigation measures is currently not known. However the County Council has concerns about the proposed area to the South West Wisbech. This site may require significant transport infrastructure on both the local and strategic transport network to make the site acceptable in transport terms and therefore the site may be unviable for a potential developer (dependent on the scale of the development delivered at that site).
 55. The **map of Wisbech** (page 35) would be improved by showing the location of Wisbech Grammar School. The map could also show the River Nene which flows through Wisbech. This is an important watercourse, particularly given its close proximity to the West Wisbech extension area.

Section 3.3: March

56. As with paragraph 3.2.1, the County Council feels too much focus is placed by the Core Strategy on low education attainment as the cause of limited investment in March in **paragraph 3.3.5**. As with Wisbech, educational attainment is one of several factors, outlined above, which contribute to the economic competitiveness of March. It is considered that this paragraph needs to be rewritten to highlight the range of factors that impact on the competitiveness of the town.
57. For policy **CS7 (March)**, based on the potential size of development sites proposed, additional secondary school capacity may be required to meet the

arising demand. It would be helpful for service planning to have more detail about the size of sites and expected timescales for their delivery.

58. The County Council has interests in land close to the broad locations identified for growth in March, and would wish to be consulted and closely involved in any further work on developing Masterplans in this location.
59. In line with the comments made in relation to policy CS5, it is unclear what approach would be taken to assessing and securing potential sites for new secondary school provision, should it be needed.
60. The policy for March does highlight a couple of transport issues for the areas identified for development. However the policy could be enhanced through a reference to the Market Town Transport Strategy. A Transport Assessment and travel plan will be required for all major developments, along with mitigation measures and incentives to enhance sustainable modes. Any proposed accesses will be required to be assessed and agreed with the County Council through the planning process.

Section 3.4: Chatteris

61. The Council strongly supports reference in paragraph 3.4.2 to the South Fens Business Centre as a means to harness 'knowledge spillover' from the Cambridge sub-region economy. The Council is also supporting the next phase of the South Fens Centre.
62. Regarding policy **CS8 (Chatteris)**, based on the potential size of development sites proposed, additional secondary school capacity may be required to meet the arising demand. It would be helpful for service planning to have more detail about the size of sites and expected timescales for their delivery.
63. In line with the comments made in relation to policy CS5, it is unclear what approach would be taken to assessing and securing potential sites for new secondary school provision, should it be needed.
64. The policy for Chatteris does highlight a couple of transport issues for the areas identified for development. However the policy could be enhanced through a reference to the Market Town Transport Strategy.

Section 3.5: Whittlesey

65. It is welcomed that the Nene Washes and Luttersey nature reserves are acknowledged within policy **CS9 (Whittlesey)**. However, other wildlife designated sites, including Common Wash and Wash Road Pollard Willows County Wildlife Sites are situated near to development areas. Therefore, it is considered that the specific issues relating to the proposed development to the north and east of Whittlesey should include reference to all nearby wildlife designations.
66. The policy for Whittlesey does highlight a couple of transport issues for the areas identified for development. However the policy could be enhanced through a reference to the Market Town Transport Strategy.

Section 4: Delivering Infrastructure

Section 4.1: Delivery of infrastructure

67. The Council generally supports policy **CS11 (Supporting and Managing the Impact of a Growing District)** subject to issues raised and amendments suggested below, and especially alongside policy CS5 which highlights the need for appropriate education provision to be secured.
68. If a Community Infrastructure Levy is used to replace parts of this policy, there would need to be the assurance that this either did not replace the need for the land for new schools, or took appropriate account of this previous policy. This would again be especially important looking at appropriately mitigating the impact of development across a number of sites, especially where allocation of land for schools may have an impact on development viability.
69. As currently drafted, policy CS11 appears to be quite general and similar in content to Circular 05/05. At present it does not set out the range of contributions that may be sought from developers. It is also somewhat unclear whether the District Council will consider introducing a Community Infrastructure Levy (CIL) charging schedule.
70. Para 4.1.6. notes that developer contributions will be secured under S106 and also suggests that contributions will be pooled if developments are not of sufficient size to warrant onsite infrastructure. CIL should be mentioned in this paragraph in order to 'future proof' the document. From 2014, severe restrictions will be imposed on the collection and pooling of S106 contributions.
71. The Core Strategy states that 'assuming that the CIL regulations remain in place (or similar arrangements introduced), then the Council will prepare and adopt such a CIL to supplement (and potentially part replace) the arrangements set out in this policy. However as CIL regulations are still in place and the Government is supportive of the regulations and there is no indication that CIL will be abolished and authorities across the country are moving forward with CIL. Therefore it is recommended that CIL should be referred to in Policy CS11 now, and there would be no need for a 'partial replacement' of the Policy when Fenland adopt CIL. This should help to future proof the document, otherwise it could become out of date very quickly.
72. It will be important to list the types of infrastructure that might be required, and given importance of achieving the vision of a 'Connected Fenland' it would also be helpful to include reference to high speed broadband and include wording which states that all new development will be expected to incorporate high speed broadband connections.
73. **Policy CS11** notes: *'The Council may be prepared in exceptional cases to negotiate developer contributions more flexibly where it can be clearly demonstrated that the proposal would be commenced and completed to an agreed timeframe. Where such an approach is adopted a legal obligation will be entered into to ensure compliance regarding commencement and completion'*
74. The County Council queries the approach here where the policy appears to imply that if developments are built quickly, then there may be potential for a

discounted S106, which may support growth. However this approach could cause the County Council difficulties with regard to service provision and therefore the suggestion is that this paragraph is reworded to *“The Council will be prepared in exceptional cases to negotiate developer contributions more flexibility where it can be clearly demonstrated that there are issues with economic viability”*.

Section 4.2: Responding to climate change and managing the risk of flooding in Fenland

75. Regarding policy **CS12 (Responding to Climate Change and Managing the Risk of flooding in Fenland)** the Council welcomes the inclusion of a section on responding to climate change and managing flood risk in the Core Strategy and the requirement for new developments to take account of longer term climate impacts and the need to minimise resource consumption. However, it is considered that this section would benefit from a clearer emphasis on the importance of improving energy performance and minimising carbon emissions prior to exploring options for renewable and low carbon energy provision.
76. It would be beneficial to specify a target for the contribution of decentralised renewable and low carbon energy to the total energy requirements for new developments. This would help to provide more of an incentive for appropriately scaled systems and help to avoid ‘bolt-on’ systems that provide little additional value in terms of economic benefits and CO₂ reductions to the building occupiers.
77. The County Council supports the policy recommendations regarding flood risk and drainage.
78. **Policy CS13 – Facilitating the creation of a more sustainable transport network in Fenland.** This policy is welcomed by the County Council. The following paragraph (taken from policy CS13) is unclear as to what it is saying.

“Development that has transport implications, such as the effect of development on road safety, parking, access and circulation, traffic congestion, design of new infrastructure and other material planning considerations, will be granted subject to the proposal not resulting in an unacceptable impact on any element of the transportation network including highway safety, including ...”
79. It may be better to state that any development that has transport implications will not be granted permission unless mitigation measures have been identified which make the development acceptable in transport terms; and that all development will be required to take account of the bullet points when master planning and delivering the development.
80. It is suggested that the fourth point should say ‘Transport Assessments and work place and residential Travel Plans. Securing funding towards the Market Town Transport Strategies or any superseding documents will help to deliver this objective.

Section 5: Building Quality

81. The Council welcomes the inclusion of protection for the historic environment in policy **CS14 (Delivering and Protecting High Quality Environments across**

the District) and would recommend that point (a) is altered to read (new text underlined):

- *protects and enhances any on-site and adjacent heritage assets and their settings, taking into account locally designated sites and the special protection given to nationally designated sites.*

This could be supported in the accompanying text with reference to the unique and vulnerable historic environment of the Fens.

82. The Council would also welcome further detail on the implementation of Planning Policy Statement 5 'Planning for the Historic Environment', and would wish to stress the importance of early engagement with the County Council's Historic Environment Team as advisors to the planning authority.
83. For clarity the Council recommends that **paragraph 5.1.7** refers to designated and undesignated heritage assets. Information on currently identified heritage assets is held in the County Historic Environment Record.
84. The Council welcomes the criteria for proposals to protect and enhance biodiversity on and surrounding proposed sites, and the reference to designated sites within policy CS14 (b).
85. Core Objective 2.1 is to "*avoid damage to designated sites and protected species*", whilst Core Objective 2.2 is to "*maintain and enhance the geographical range, amount and viability of habitats and species*" respectively. It is considered that these objectives could be reflected more positively in policy CS14. Policy CS14 (b) states that development will only be permitted if it "*protects and enhances biodiversity on and surrounding the proposal site, taking into account locally designated sites and the special protection given to internationally and nationally designated sites.*" It is considered that this point should be amended to take account of both habitats and species, particularly priority habitats and species as outlined in the Section 41 list of the Natural Environment and Rural Communities Act (NERC) 2006. (See information at: <http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>)
86. It would be helpful if policy CS14 (f) refers to the RECAP Waste Management Design Guide which is a Supplementary Planning Document being prepared by Cambridgeshire County Council and Peterborough City Council. This is expected to be adopted in late 2011 / early 2012.

Section 6: Previous 'Saved Policies', Implementation and Monitoring

Section 6.1: Saved Policies

87. Regarding 'Saved Policies' paragraph 6.1.8 lists partners and organisations that will help to deliver the strategy and put policies into action. The County Council is listed as the authority for green infrastructure for Cambridgeshire. It is important that each of the Cambridgeshire authorities is fully engaged in delivering the Green Infrastructure Strategy and it is recommended that Fenland District Council is also identified as a key organisation in achieving this.

Section 6.2: Implementation and Monitoring Framework

88. Regarding the Implementation and Monitoring Framework policies CS5 to CS10 and policies CS12 and CS13, there is an indicator of effectiveness: *“number of applications approved contrary to criteria set out in the policy – target to minimise.”* It is considered that this target should be more ambitious and should be set at zero, as it will be important to the delivery of the Core Strategy’s objectives that development conforms to its policies.
89. It is considered that a clearer emphasis is required on how the biodiversity requirements of policy CS9 (Whittlesey) are implemented and monitored. There is no target to monitor the impact of development on biodiversity, particularly the impact of the Regional Freight Interchange and West Wisbech extension area. It is suggested that a biodiversity target should be included, for example:
- area of losses and gains of habitat (both on and off-site)
 - area of loss / gain to designated sites
90. The County Council welcomes the use of information from the biological records centre during the determination of planning applications in policy CS14 (Delivering and Protecting High Quality Environments across the District). It also welcomes the recognition of the implementation of project-level Habitats Regulations Assessment (HRA).
91. Regarding the indicator *“Condition of RAMSAR, SPA, SAC, SSSI, NNRs and County Wildlife Sites - target to maintain and approve”* it is unclear what ‘target to maintain and approve’ means, given that the Council does not approve the designation of these wildlife sites. It is suggested the wording be amended to *“Condition of Ramsar, SPA, SAC, SSSI, NNRs and County Wildlife Sites - target to maintain and improve.”* (For information, RAMSAR is not an acronym and should be referred to as Ramsar, the location where the international agreement was signed.)
92. While the indicator for *“Improved local biodiversity on site through S.106 obligations – target to improve”* is welcomed, there is no proposed monitoring of ecological compensation provided off-site (e.g. biodiversity off-setting). Therefore, it is suggested that an additional target / indicator should be included to cover the following:
- *Successful off-site biodiversity compensation (biodiversity off-setting) through CIL – target successful compensation achieved*
93. The Council would strongly recommend that Policy CS14 is amended as follows (new text underlined):
- *Risks (third bullet point) – A risk of low quality biodiversity, geological and historic environment assessment*
 - *Contingencies (fourth bullet point) – Seek further engagement with partners to identify whether more needs to be done to conserve biodiversity, geology and heritage assets.*

Section 6.3: Housing Trajectory 2001-2031

94. This graph (page 75), with the relationship of existing planning permissions to housing trajectory and proposed growth, highlights the point made above about clarity over where potential growth is planned. This will be particularly important for the County Council in its service planning.

Appendix A - Parking Standards

Considering the draft strategy, the Local Transport Plan and the Market Town Transport Strategies all support the provision of sustainable transport infrastructure; it is disappointing that the Draft Core Strategy does not include Cycle Parking Standards and Cycle parking Design Guidance. This guidance is particularly useful for guiding developers as to what scale and design of cycle parking is expected across the district, and particularly Market Towns.