

Annex to Cabinet Paper on the Fenland District Council - Communities Development Plan Core Strategy - July 2012

1. GENERAL COMMENTS

Cambridgeshire County Council welcomes the opportunity to comment on the Fenland Communities Development Plan – Core Strategy and to have been involved in its preparation. Overall this is a succinct, easy to follow document, which helps to explain the broad breadth of the policies. The comments raised follow the structure of the consultation document.

The County Council welcomes the objective to minimise the need to travel and deliver an integrated and sustainable approach to transport. This fits in well with the objectives set out in the latest Cambridgeshire Local Transport Plan (LTP3).

One of the County Councils objectives is to work in partnership with Fenland District Council (FDC) to ensure that our transport policies and plans, including the Local Transport Plan and the Market Town Transport Strategies for the four Fenland Market Towns, fit well with the Fenland Core Strategy. We welcome FDC's plans to prepare Market Town Strategies for each market town, and would be pleased to work with FDC to determine and review the details of these as they progress, to ensure strong links between these and the Market Town Transport Strategies are achieved. Already our officers have been working in partnership on the preparation of a long term transport strategy for the district, and will continue to take this forward.

The County Council support policies in the Core Strategy aimed at managing out-commuting and providing improvements to broadband infrastructure which can help to reduce the need to travel. We also welcome the inclusion of site allocations in the document.

2. Spatial Portrait Key Issues Vision and Objectives

This section refers to the demography and essential characteristics of the district. The Spatial Portrait of Fenland and Key Issues have acknowledged the level of deprivation in the District, particularly in and around Wisbech. It is also pertinent to point to the ageing population within the District as a whole. Recent Census figures issued in July this year confirm the high proportion of those over 65 relative to other districts. The recent White Paper "Caring for our Future" encourages independent living. In relation to Adult Social Care the County Council objects to the omission of policies and is keen to seek the reinstatement of the policy relating to lifetime and wheelchair homes, to ensure Fenland residents are not disadvantaged and the cost burden of seeking to retrofit and adapt homes in the future does not become an increasing cost liability for local taxpayers through either the National Health Service and/or the County Council meeting the additional costs of this issue is not addressed at source. In this regard, the Equality Impact Assessment dated 26th July 2012 refers to lifetime homes and to regulations superseded by the Equality Act 2010.

Recommendation - the omission of a policy covering Lifetime and Wheelchair Homes needs to be rectified.

3. Key Issues

The main strategies which shape the Core Strategy and which are part of the evidence base consist of the Fenland Sustainable Community Strategy, and the Fenland Neighbourhood Planning Vision. It is recommended that the inclusion of additional narrative relating to the new Fenland Economic Development Strategy would also add clarity and provide for the integration and rationale for the jobs and

employment dimension of the Core Strategy. In particular, there are other strategies produced by partners and key stakeholders which help to define emerging policy documents such as the draft Health and Wellbeing Strategy and the Joint Strategic Needs Assessment which would also add context. These are also referred to in paragraphs 2.5.3 and could include the Minerals and Waste Local Development Framework for Cambridgeshire and Peterborough.

Recommendation – the insertion of supporting text to explain the Economic Development Strategy would add clarity to the Core Strategy jobs and employment agenda.

4. Policy CS 2 Growth and Housing (Scale & Distribution)

The Core Strategy introduces future housing provision as minima in the market towns; strategic allocations and possible new broad locations are identified in Wisbech, March, Chatteris and Whittlesey. The previous housing numbers promoted in 2011 have been removed. Housing levels elsewhere are set at a maximum limit of 1200. The County Council considers that the revised wording affords more flexibility than before; the removal of the upper ceiling and five year blocks for each market town should facilitate growth over the life of the plan and are supported.

It is understood FDC intends updating their evidence base which is welcomed, in particular the Strategic Housing Land Availability Assessment (2008) and also the Open Space Study (2006) which require updating. The Submission document of the Core Strategy will be supported by an up to date Strategic Housing Market Assessment. It is possible the scale and distribution of growth may need to be refined on the basis of this new evidence.

Whilst the general aspiration for growth in Fenland is supported, it is important that a balance between job creation and growth in housing is maintained and also that the locations of growth are well served by appropriate transport infrastructure.

Recommendation - the evidence base supporting the Core Strategy particularly in relation to housing growth and employment provision needs to be up to date and robust, in order to support and underpin the delivery of homes and jobs.

Housing Growth needs to be located in areas well served by appropriate transport provision.

5. Policy CS4 Employment Tourism Community Facilities and Retail

The amount of employment land has been apportioned for each town, which will provide additional guidance and be helpful to the development sector. However the overall land provided for employment has fallen to 85ha from 125ha following a review. This reduction in employment provision needs to be explained and addressed to specify how alternative job and employment opportunities will be addressed. If the Regional Freight Depot near Whittlesey were to come forward, this Council would expect to be part of any local authority working group especially in recognition of the designations under the Minerals and Waste LDF.

Recommendation - the reduction in employment land from 125ha to 85ha needs to be fully justified or alternative employment provision needs to be made available.

The level of out commuting from the District is almost 40%, it is considered that strategic allocations should aim for a mixed use approach based upon careful master planning principles.

The provision of Broadband is mentioned in Policy CS4; more explicit reference to the requirement for ducting directly to households and businesses is required and is likely to promote growth, attract further inward investment, encourage homeworking and reduce isolation.

Recommendation – Either a new policy is required, or Policy CS4 needs to be strengthened in relation to supporting and clarify what broadband requirement would be expected on new development sites.

Cambridgeshire County Council is supportive and has a clear commitment to tourism in increasing economic activity. In this regard, the impact upon natural and heritage assets on page 25 is welcomed.

Recommendation - the role of heritage tourism needs be addressed within the Core Strategy, given the very high potential in the district for recovery of artefacts preserved in peat and perched/high water tables.

We support the strong “town centre first message” set out in the Core Strategy and the focus on maintaining and enhancing the vitality and viability of the town centres. In this respect we would re-emphasise the key contribution which the market town libraries make as part of the mix of activities which make market town centres attractive destinations. Past experience and evidence locally and nationally demonstrate the impact that locating a library in a prominent, visible location in a local centre can have on encouraging footfall to the shops and other community facilities as well as on encouraging the intensive use of the library itself and ensuring its benefits in meeting the community’s needs.

The County Council supports policy **CS4 (Employment, Tourism Community Facilities & Retail)** in relation to:

- *“existing cultural... facilities should be protected and where possible enhanced”*. In this context we would emphasise the important role played by public libraries in providing access to cultural resources in printed, audio-visual and digital formats.
- *“Retaining community facilities”*. We would emphasise the important role of libraries in promoting community cohesion as public social spaces open to people of all ages, backgrounds and abilities

Community space provided in all the libraries is currently very well used and will need to be enhanced to meet the needs of the growing communities. The large meeting rooms and small interview spaces in the libraries are used by a wide range of local organizations and groups for advice sessions, events and activities, and in March Library will be used again for weddings from December, 2012.

6. CS 5 – Urban Extensions

It is Recommended - Section 4.6.9 (p48) and Section 5.3.4 (p64) be amended slightly to reflect LTP3.

The objectives set out in these paragraphs are not set out by the LTP3 for Fenland. Rather, LTP3 quotes the objectives that were set by the Fenland Transport and Access Group. These paragraphs could either quote the overarching objectives of LTP3, or accurately reference the quoting of the TAG objectives in LTP3.

Policy CS5 (p66) Local Transport Plans are no longer 5 year documents so are likely to be kept under review and updated as required (rather than on a 5 year basis).

7. Market Town Policies CS6-CS9: comments relate firstly to general service provision and specific points.

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. The overall level of housing growth proposed produces an overall demand for school places of between 13 forms of entry and 18 forms of entry using the County Council's standard multiplier. The following education requirements apply:

- **Wisbech;** 3.6FE to 5FE of primary and secondary school places
- **Kings Lynn and West Norfolk Borough Council area;** 0.7FE to 1FE of primary and secondary school place
- **March;** 5FE to 7FE of primary and secondary school places
- **Chatteris;** 2FE to 2.6FE of primary and secondary school places
- **Whittlesey;** 1.3FE to 1.8FE of primary and secondary school places
- **Other;** 1.4FE to 2FE of primary and secondary school places.

The proposed levels of housing growth planned for the market towns also have implications for library provision. New development will put added pressure on the existing library facilities and service across the Fenland area. March, Wisbech and Chatteris. Libraries are all considered to be at their physical capacity and will require additional accommodation to meet the needs of the new residents in their catchment areas. At March, in particular, where 4,200 new homes are proposed, extra library and community meeting space will be required. This could take the form of an extension to the existing building and possibly a small self service "micro library" provided on site in the larger urban extension, in order to complement the full service available at the town library and meet especially the day-to-day needs of families with young children, older people and other less mobile members of the community.

Recommendation - Developer contributions will be required to fund the extension to existing library accommodation within market towns as a consequence of additional development, and an increase in population and demands for services.

Wisbech Policy CS6

The County Council notes that the housing level is provisional. The strategic allocation abuts the county boundary to the east and is related to an allocation of 550 dwellings already identified in the Core Strategy for King's Lynn and West Norfolk. The broad locations designated to the west of the town are severely constrained by ground conditions, sewage capacity, highway capacity and flood risk considerations. It is therefore considered that authorities in Cambridgeshire and Norfolk together with the local planning authorities should jointly explore the viability of the proposals with other agencies and public bodies and address this through the Local Plan and CIL processes.

The County Council welcomes the inclusion of the Nene Waterfront and Port as a growth area and notes this may also include land in King's Lynn and West Norfolk. There should be an acknowledgement that Wisbech Port is designated as a Transport Safeguarding Area under the Minerals and Waste Site Specific DPD and it

is considered that the preparation of a town strategy would require close partnership working between authorities in Cambridgeshire and Norfolk.

March Policy CS7

The County Council supports in principle the overall approach towards the distribution of growth. It is noted that the library is shown on the key diagram, and it is suggested for the sake of consistency that other public buildings in each town could be shown. The reopening of the March – Wisbech railway line is mentioned in CS6 and could be added here again for the sake of completeness as a feasibility study is currently underway. Safeguarding of the line could be mentioned as a means of preventing inappropriate development. This could add further flexibility allowing implementation to take place post 2031.

The planned updating of the Open Space Study will afford the opportunity to give quantitative and qualitative assessments of land and facilities throughout the district. Notwithstanding that the provision of leisure facilities is a district matter; the County Council is keen to support plans and proposals that promote health and well being. It would be appropriate to have a reference to the Green Infrastructure Strategy if a country park were to be provided in March. Depending upon the eventual location of a country park, the maintenance and enhancement of the rights of way network should be considered from inception to ensure full integration with the existing community.

Chatteris Policy CS8

The “redevelopment” of Cromwell Community College is mentioned. The current refurbishment and building programme under the BSF scheme for the school is designed to enhance its role as a community hub where uses can be co-located to optimise the efficient use of land and facilities. If the site were redeveloped over the life of the plan, it would be important to allocate another site for a school.

Whittlesey Policy CS9

The County Council acknowledges the deletion of one site as a result of the Habitats Regulation Assessment recently undertaken and considers this to be reasonable in the light of the evidence submitted in relation to the proximity to the Nene Washes.

8. CS 10 Rural Areas Development Policy

Depending on the extent of future growth, the current library service will also be required for Wimblington, Doddington, Manea and Wisbech St Mary. These villages are all currently served by the mobile library and many residents visit the market town libraries at March, Chatteris and Wisbech to access the wide range of library services and partners services based there. Again, enhanced provision in these growth communities could take the form of small self service “micro-libraries” based in shared community buildings for less mobile members of the community, supplemented by additional facilities at the libraries in the market towns. Once again, developer contributions would be required to fund such enhancements to current provision.

9. CS 11 Supporting and Managing the Impact of a Growing District

This policy needs to be strengthened as it is taken forward to ensure the full range of infrastructure requirements in planning for sustainable development, is properly planned for at the outset and does not become a cost burden for either the local community or public sector in the future.

Recommendation – Policy CS11 should incorporate education, transportation (including roads, footpaths and cycleways), libraries, public open space, adult social care requirements (Lifetime Homes) carbon offsetting.

10. Policy CS12 Responding to Climate Change & Managing Flooding Risk

It is Recommended that some additional explanatory text to set the context of the policy relating to the causes of climate change and adaptation to climate change would prove helpful.

11. CS14 Delivering & protecting high quality Environments

In relation to a) it would be helpful to add the following wording “designated assets and national undesignated heritage assets”.

English Heritage do not deal with undesignated assets, this is undertaken by the Cambridgeshire Historic Environment Team. This has minor implications for the text in the Glossary and the Monitoring and Implementation Framework. Archaeology is also a service within the County Council and could therefore be added to the list on page 71.

Response to Fenland District Council relating to the Fenland Economic Development Strategy 2012 2031 Consultation Draft

BACKGROUND

Cambridgeshire County Council welcomes the opportunity to comment on the Fenland Economic Development Strategy 2012 -2031 Consultation Draft. Overall the Council supports the Strategy, but with some concerns over the job growth targets.

This Council worked closely with the District Council to develop the original Economic Development Strategy in 2007 and will seek to play its part in the delivery of the Action Plan for the new Strategy.

The Strategy forms part of a suite of strategies to achieve the strong ambition of the District that is set out in the Corporate Plan and Fenland Communities Development Plan: Core Strategy. The significance of the Economic Development Strategy as an evidence base and building block for the Core Strategy could be highlighted within the Submission Draft in addition to the Fenland Sustainable Community Strategy and the Fenland Neighbourhood Planning Vision.

The County Council considers that the Strategy's Vision for Fenland, "Building a competitive vision for Fenland" will allow it to embrace both change and growth. The County Council wishes to support the Vision set out within the document as it will support and enhance the ability of residential and business communities at all levels to increase the overall level of economic activity. This should in time have positive benefits for individuals and specific areas within the District in need of additional support. The creation of jobs should over the life of the Core Strategy reduce out commuting, and create more sustainable patterns of development. Between 2012 and 2031, 7200 net new jobs are required to align with the 11,000 new homes planned over the period. The figure of 7200 new jobs by 2031 is some 2000 more jobs than the most recent baseline scenario, and is therefore ambitious.

The County Council supports the 5 key themes identified for the model for growth:

- Enterprise
- Workforce development
- Enabling infrastructure
- Business retention and growth
- Inward Investment

The Strategy acknowledges the need for a partnership approach across the public, private and voluntary sectors for its successful delivery. Supporting these various objectives should not be an issue for the Council given the range of joint work going on or planned, particularly on the superfast broadband campaign, long term transport strategy, floods and water management, inward investment and the Wisbech 2020 initiative. Contributing to increasing the stock of commercial premises, as has happened in Chatteris through the County Council's investment in the South Fens Enterprise Park, will require an appropriate allocation in the County Council's Business Plan.