

CONSULTATION RESPONSE TO FENLAND DISTRICT COUNCIL ON BOTH THE FENLAND COMMUNITIES DEVELOPMENT PLAN - CORE STRATEGY- FURTHER CONSULTATION DRAFT AND POLICIES MAP (JULY 2012) AND FENLAND DRAFT ECONOMIC DEVELOPMENT STRATEGY 2012-2031 CONSULTATION DRAFT (JULY 2012)

To: Cabinet

Date: 2 October 2012

From: Executive Director: Economy, Transport, Environment

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: Not applicable **Key decision:** No

Purpose: To agree the County Council response to the Fenland Communities Development Plan - Core Strategy – Further Consultation Draft and Policies Map (July 2012) and the Fenland Economic Development Strategy 2012-2031 Consultation Draft (July 2012).

Recommendation: Cabinet is asked to:

- a) Agree the consultation response to Fenland District Council on both their Core Strategy (Appendix1) and the Draft Economic Development Strategy (Appendix 2).
- b) Delegate to the Cabinet Member for Growth and Economy in consultation with the Executive Director, Economy, Transport and Environment the authority to make minor amendments to the responses before submission.

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1. BACKGROUND

- 1.1 Fenland District Council (FDC) published the Fenland Community Development Plan Core Strategy on 26 July 2012 for public consultation. This Plan will eventually replace the existing Local Plan which was adopted in 1993. At the same time FDC also produced their Economic Development Strategy. This report seeks to consider both of these consultation documents, given that both sustainable development and economic growth need to be considered at the same time, which is an approach entirely consistent with the Coalition Governments approach to addressing sustainable economic development.
- 1.2 The FDC Core Strategy was first published for consultation in July 2011. The revised Core Strategy takes forward this earlier work. Both the revised Core Strategy and the Economic Development Strategy look forward and plan for at least 11,000 new homes for Fenland District up to 2031.
- 1.3 Due to the Core Strategy consultation period having a closing date of 5 September 2012 an officer's response on the Core Strategy was submitted before the deadline expired, thereby safeguarding this Councils opportunity to make comments. The deadline for submission of comments to the Draft Economic Development Strategy ended on 14th September 2012 which also required a draft response to meet the deadline. It has been agreed with FDC that after this Cabinet meeting the responses can be amended or replaced, subject to member views.
- 1.4 Fenland District Council has reviewed 420 representations submitted to the earlier Core Strategy issued in July 2011. This current version has been prepared to be in alignment with The National Planning Policy Framework (March 2012).
- 1.5 Fenland District Council has also been leading on the 'Shaping Fenland Together' project. This has been very important in helping shape and prepare the draft Core Strategy and Economic Development Strategy. 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.
- 1.6 The refreshed Economic Development Strategy follows the format of previous versions, albeit extending to 2031. The Strategy is acknowledged as being part of a suite of strategies aimed at achieving the ambition of the district set out in the FDC Corporate Plan, and Core Strategy. The Strategy adopts five key themes for growth:
 - Enterprise;
 - Workforce development;
 - Enabling infrastructure;
 - Business retention and growth, and;
 - Inward Investment.

2. THE MAIN ISSUES

- 2.1 The FDC Core Strategy addresses a number of important issues on which the District Council is looking for a response. Whilst this document is helpful in moving the growth and economy of Fenland forward, there are strategic

issues of importance which require further consideration, which need to be carefully addressed, these include:

- Economic development;
- The scale and distribution of growth;
- Transport;
- Education;
- Market Towns, and;
- Adult Social Care.

Economic Development

- 2.2 The amount of employment land allocated to market towns in the revised Core Strategy has been reduced. Overall land provided for employment has fallen from 125ha to 85ha following a review of employment land availability. It is recommended that a robust statement on the need to provide additional land to support jobs be included within the County Council response. If the Regional Freight Depot near Whittlesey, now viewed as regional provision, were to come forward, the County Council should expect to be part of any local authority working group especially in recognition of the designations under the Minerals and Waste Local Development Framework (LDF).
- 2.3 The level of out-commuting from the Fenland District is almost 40%, which would indicate that any strategic land use allocations should aim for a mixed use development approach based upon careful master planning principles to ensure new homes and new employment opportunities are addressed in a balanced way, and consideration given to the availability and quality of public transport.
- 2.4 The provision of Broadband which alongside transport, is critical to the infrastructure and vibrancy of job opportunities particularly in the rural areas is referred to in Policy CS4. A much more explicit reference to ducting directly to households and businesses is required in the Core Strategy given the importance of Broadband which is recognised as being one of the key ingredients to promoting and sustaining economic growth, and attracting inward investment, encouraging home-working and reducing isolation. This point also needs to be strengthened within the Economic Development Strategy.

The Scale of Growth

- 2.5 Major growth is focussed on the market towns of March, Wisbech, Chatteris and Whittlesey, with large scale urban extensions at each. Some of the major growth locations, are classified as 'strategic allocations' and clearly defined whilst others, are shown as broad locations for growth. At least 11,000 new homes are planned across the District up to 2031. In addition, the Core Strategy has been amended which will secure fewer affordable houses across the range and scale of housing sites.
- 2.6 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.

Transport

- 2.7 The County Council welcomes the “overarching aim within CS 13 (A) to reduce the need to travel”. The creation of sustainable communities where housing and jobs are in alignment would normally reduce the need to travel; a specific reference to walking and cycling and public transport within the opening paragraph of CS 13 (A) would add context. The County Council welcomes the acknowledgement of cross boundary transport issues, and it would suggest that these should be “overcome” rather than “encompass(ed)” Ease of access to jobs and services is already a joint priority for both authorities; and in this regard a specific reference to the Third Local Transport Plan (LTP3) would be helpful. The safeguarding of existing strategic rail and road corridors for route upgrades would also allow additional flexibility for the period after 2031. The ducting for super fast broadband would normally within the limits of the highway; the wording within CS 4 relating to broadband could also be mentioned within CS13 and CS14.

Education

- 2.8 Any additional housing allocations above the existing Strategic Housing Land Availability Assessment (SHLAA) will need to contribute towards education provision, through capital provision, as well as the land on which to build new schools or classes. With the move towards Community Infrastructure Levy (CIL) instead of S106 agreements, it is important that appropriate sites are identified and allocated for school use. Access to high quality childcare provision normally enhances economic activity levels. Post-16 provision is planned on a sub-regional basis in comparison to the planning of other education provision. A key consideration will be the impact of development proposals in neighbouring Council’s Local Plans. Until further detail is available, it is not possible to determine the likely demand for additional provision.

Market Towns

- 2.9 Appendix 1 provides more detail on each of the market towns across the District where the key points can be found. However, in relation to Wisbech, there is a strategic risk in relation to infrastructure investment which needs to be highlighted. The strategic housing allocation abuts the county boundary to the east, which relates to an existing allocation of 550 dwellings 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. It is therefore considered that both Cambridgeshire and Norfolk County Council along with the two District Councils should fully explore the cross county boundary issues particularly with regards to viability and the apportionment of contributions from any S.106 or successor funding mechanisms towards service provision, including education.
- 2.10 In addition, the inclusion of the Nene Waterfront and Port as a growth area may also include land in King’s Lynn and West Norfolk. It is considered that the preparation of a town strategy would require close partnership working between the four authorities. Wisbech Port is designated as a Transport Safeguarding Area under the Minerals and Waste Site Specific DPD.

Adult Social Care

- 2.11 The Fenland Core Strategy acknowledged the level of deprivation in the District, particularly in around Wisbech. It is also clear the District has a significant elderly level population across the District. The 2011 Census

figures confirm the high proportion of those over 65 relative to the county and other districts within Cambridgeshire. The removal of the policy relating to lifetime and wheelchair homes is extremely regrettable and it is likely this omission will place tremendous pressure on the public sector authorities responsible for adult social care as well as the National Health Service should this omission remain. Consequently it is recommended as contained within Appendix 1 that an objection be submitted to the District Council. Indeed the Government's recent White Paper "Caring for our Future" encourages independent living.

3. ALIGNMENT WITH PRIORITIES AND WAYS OF WORKING

3.1 Developing the local economy for the benefit of all

The Core Strategy promotes a high level of growth for the District. The reduction in employment land is an area of concern and the relationship to the Economic Strategy should be defined.

3.2 Helping people live healthy and independent lives

The Core Strategy sets out a number of policies that will be used to secure community infrastructure and services as part of new developments. The omission of the requirement for Lifetime Homes is, however, of great concern.

3.3 Supporting and protecting vulnerable people

The Core Strategy as currently drafted aims to address deprivation through its strategic objectives. The pathways for doing so such as policies relating to wheelchair and lifetime homes should be reinserted given the age profile of the District as a whole.

3.4 Ways of Working

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 71). 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*

4.0 SIGNIFICANT IMPLICATIONS

4.1 Resource and Performance Implications

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.

4.2 Statutory, Risk and Legal Implications

When adopted, the Core Strategy will be part of the development plan for the District.

4.3 Equality and Diversity Implications

The Core Strategy promotes growth in the District to realise benefits for local people. The Vision Statement includes the following: *“Through growth, current issues such as community deprivation ..and low skills will be tackled and addressed “*. The objectives include economic activity and healthy, inclusive and accessible communities.

4.4 Engagement and Consultation Implications

The County Council is being consulted on this draft Core Strategy and Economic Development Strategy.

4.5 Public Health Implications

The Core Strategy as currently drafted aims through Policy CS 14 to deliver and protect the environments across the District. This develops the overarching objective of Healthy Inclusive and Accessible Communities. The supporting text for CS14 should refer to the Green Infrastructure Strategy (2011), the draft Health and Well Being Strategy (2012) to ensure that access to blue and green infrastructure is maintained and enhanced. Access to affordable housing in wards where deprivation is acute as identified in paragraph 2.1.5, and this should be included in the supporting text of policy CS2.

Source Documents	Location
Fenland Communities Development Plan - Core Strategy – Further Consultation Draft and Policies Map (Fenland DC) July 2012	Development Strategy, Castle Court 2 nd Floor A Wing, Shire Hall, Cambridge.
Strategic Housing Land Availability (SHLAA) (Fenland DC) March 2008	http://www.fenland.gov.uk/article/5657/Further-Draft-Consultation-2012
Strategic Housing Market Assessment (SHMA) (Cambridgeshire Horizons) 2011	http://www.fenland.gov.uk/article/5691/Policies-Map
Affordable Housing Economic Viability Study (Fenland DC, East Cambridgeshire DC, Forest Heath DC, St Edmundsbury BC) 2009/10	http://www.fenland.gov.uk/article/3566/Housing
Fenland Infrastructure Delivery Plan (FDC) July 2012	http://www.fenland.gov.uk/CHttpHandler.ashx?id=2496&p=0
Employment Evidence Report (FDC) July 2012	http://www.cambridgeshirehorizons.co.uk/our_challenge/housing/shma.aspx
Gypsy and Traveller Sub -Regional Accommodation Needs Assessment (GTANA) 2011	http://www.fenland.gov.uk/article/3565/Affordable-Housing-Viability-Study
Open Space Site Specific Issues and Options Paper (FDC) December 2006	http://www.fenland.gov.uk/article/3565/Affordable-Housing-Viability-Study
Strategic Flood Risk Assessment (FDC/Scott Wilson) July 2011	http://www.fenland.gov.uk/article/3565/Affordable-Housing-Viability-Study

Equality Impact Assessment FDC July 2012	http://www.fenland.gov.uk/CHttpHandler.ashx?id=6788&p=0
Habitats Regulation Assessment FDC July 2012	http://www.fenland.gov.uk/CHttpHandler.ashx?id=6788&p=0
Fenland Economic Development Strategy 2012-31 Consultation Draft (FDC)	http://www.fenland.gov.uk/CHttpHandler.ashx?id=6822&p=0 http://www.fenland.gov.uk/CHttpHandler.ashx?id=6764&p=0 http://www.fenland.gov.uk/CHttpHandler.ashx?id=1612&p=0 http://www.fenland.gov.uk/CHttpHandler.ashx?id=3771&p=0 http://www.fenland.gov.uk/CHttpHandler.ashx?id=3771&p=0 http://www.fenland.gov.uk/CHttpHandler.ashx?id=6790&p=0 http://www.fenland.gov.uk/CHttpHandler.ashx?id=6767&p=0 http://www.fenland.gov.uk/edstrategy