

and Local Plan Core Strategy

Proposed Submission Addendum June 2013







Foreword

This document sets out an Addendum (June 2013) to the Proposed Submission Fenland Core Strategy (February 2013).

The primary change which this Addendum sets out is the deletion of the proposed allocated site at North East March.

This document sets out some context behind why the Addendum is being consulted upon, how you can make your comments known and the rationale behind the changes.

It contains a full schedule of changes to the Core Strategy, together with amendments to the Policies Map (February 2013), Sustainability Appraisal report (February 2013) and the Habitats Regulation Assessment screening report (February 2013).

We encourage you to read these proposed changes and let us know whether you support or object to them.

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Part 1: Context and Consultation Arrangements

The Fenland Core Strategy contains the proposed policies and locations for growth and regeneration in Fenland until 2031.

We are now in the final stages of the preparation of the Core Strategy. We asked for your views at preliminary stages in 2011 and again in 2012. Then, in February – April 2013, we asked for representations on the final plan that we proposed to submit to the Secretary of State for independent examination – known as the 'Proposed Submission' version. We received over 400 comments that we have collated and will submit to the Inspector for his/her consideration (Note: the Inspector is yet to be appointed).

However, before we submit the plan and all outstanding comments received, it is necessary for the Council to hold another, focussed consultation.

Further details on the stage we are at with preparing the Core Strategy, together with past and future stages, are detailed below:

	MAIN STAGES	TASK	DATE
	Evidence gathering	Meetings, workshops and early consultation to identify and test issues	Ongoing
	Consultation Draft	Public consultation on the Council's draft policies	July – September 2011
	Further Consultation Draft	Further public consultation on the Council's draft policies September 201	
	Proposed Submission	Final opportunity for representations on the proposed policies	Feb – Mar 2013
Current Stage	Addendum to the Proposed Submission	Opportunity for representations to be submitted on changes as set out in the Addendum	June – August 2013
	Submission and examination	Document submitted to Government along with all public comments received during the proposed submission consultation and the addendum consultation stages. Independent Examination by a Planning Inspector	September 2013
	Adoption	Council adopts Final Plan	Approximately March 2014
	Monitoring and Review	Each year, identified targets are monitored	Annual

What is this extra consultation?

On 30 May 2013 the Council agreed to remove from the Core Strategy an area of land designated as a Strategic Allocation for development. The allocation was known as North East March, and includes the Estover playing fields as well as surrounding agricultural land.

As a result of this proposed change to the Core Strategy, it is necessary for the Council to consult on that change. We are therefore seeking your comments on the change so that, alongside those comments received at the previous consultation, we can submit your views to the Inspector.

This six week consultation runs from 9am 27 June 2013 to 5pm 7 August 2013.

To be clear, this is **not** a consultation on the entire Core Strategy. Representations received during the original February - April 2013 consultation will remain valid, but can be supplemented by any additional comments received as part of this extra consultation on the Addendum to the Core Strategy.

How to Submit Your Comments

To access the **online version of this document** please go to http://www.fenland.gov.uk/core-strategy

Alternatively, **printed versions** of this document, the Policies Map and other supporting documents, as well as the previous consultation version, can be found at the following locations:

- Fenland Hall Business Reception
- Libraries and Fenland @ your service shops for Chatteris, March, Whittlesey and Wisbech
- Mobile Library

Submitting your comments: If you wish to submit comments, please refer to the representation form and guidance note. Submitting your comments is easy. Either:

Complete a Representation Form: The representation form is available to download at www.fenland.gov.uk. Hard copies are also available at the locations above.

Email it to us at: neighbourhoodstrategy@fenland.gov.uk

Post your completed representation form to:

Neighbourhood Strategy (Planning Policy Team) Fenland District Council Fenland Hall County Road March, PE15 8NQ

Any Questions: Should you have any further queries please contact our Hotline number on 01354 622448.

Part 2: Rationale for the Proposed Change

In preparing a Core Strategy, a Council must ensure its proposals are properly evidence based, justified, reasonable and compatible with national policy. In short, the proposals must be 'sound'.

At the point of approving the Core Strategy in January 2013, the Council was confident the proposals (including the allocation of the site at N E March) were 'sound'. However, plan making is not an exact science, and alternative proposals in the Core Strategy could also be considered 'sound'. The rationale for the change to the plan is therefore as follows:

Rationale 1: High Level Sustainability Appraisal

The Sustainability Appraisal (February 2013) concluded, at the high level for March, that "from a sustainability appraisal perspective, growth should be identified in the southern segment first, if possible. Next opportunities could be explored in all three other segments" (page 15, Part 2 or the Sustainability Appraisal report, February 2013). In this regard, therefore, deletion of the N E March allocation and a further concentration of growth to the south could be considered compatible with the high level Sustainability Appraisal.

Rationale 2: Sustainability Appraisal and detailed site options

The Sustainability Appraisal also looked at more detailed site options for March (page 56-95, Part 2). This concluded that N E March was a suitable site to take forward. However, it is worth noting that, of all the sustainability criteria used to assess various candidate sites, the N E March site scored poorly (i.e. 'red' or 'orange') on 11.5 of the criteria, which was worse than two other allocated sites of S E March (5.5) and W March (6.5). It scored the same as the allocated S W March, though it is fair to say that some of the negative issues with S W March would likely be overcome due to the scale of growth, and subsequent provision of local services etc, in the broad southern segment of March; and more so than what is likely to be overcome for N E March due to the relatively small scale of growth proposed there.

It is therefore not unreasonable, when considering the four main locations currently identified for growth in March, one may conclude that the N E March site is the least sustainable. However, it must be stressed that Sustainability Appraisal is not an exact science, and counting positive and negative scores from an appraisal should not blindly lead the reader to picking one location over another. Nevertheless, it does give an indication that whilst N E March site may be a reasonable location for growth, it is perhaps not the most sustainable compared with other choices, and therefore, if a choice can be made, it would not be unreasonable to discount the N E March site in favour of alternatives, from a sustainability perspective.

As such, with the N E March site now proposed to be deleted, the Sustainability Appraisal reports have required only minimal updating, broadly along the lines that, in sustainability terms, whilst the N E March site scores reasonably well and could come forward for development, alternative and better or equally suitable options exist for delivering the growth required at March, and thus the site at N E March is not required. Full details on the changes to the Sustainability Report is set out on page 12 of this document.

Rationale 3: Redistribution of housing growth

To determine whether the proposals in this Addendum are appropriate, it needs to be assessed whether it is reasonable for the 450 homes 'lost' through the deletion of the N E March site can be made up through adding 200 homes to the S W March allocation and 250 to the windfall allocation.

Adding 200 homes to S W March appears entirely reasonable. The initial allowance (in the February 2013 Proposed Submission Core Strategy) of 300 homes in this area was always conservative based on the potential land available. Subject to detailed masterplanning, it appears entirely reasonable 500 could come forward on the site. The element of doubt is probably more to do with deliverability, and whether the site can come forward and deliver 500 (or more) in the plan period to 2031. This is always difficult to predict, but, provided good momentum is made on other sites in southern March, there is a reasonable prospect of doing so. Nevertheless, it will need careful monitoring over the years to ensure it remains on track.

Adding 250 homes to the windfall allowance for March, from 350 to 600, is more difficult to assess. It amounts to an average of 30 homes per year coming forward on unallocated sites (up from an allowance of 17.5 homes per year), anywhere from a single dwelling infill to a large site of 250 or more, and could be within the town or on the edge of the town (such as to the east, which scored well in the Sustainability Appraisal but was not taken forward as an allocation as, to date, there has been no significant developer interest). Whilst a 350 (or 17.5 per year) allowance was considered a conservative estimate, 600 is considered optimistic. Nevertheless, it is not considered unrealistic and could be achievable, especially considering the flexible nature of the policies within the Core Strategy. Again, careful monitoring will be required to ensure this target remains on track.

Rationale 4: Efficient use of land and protection of greenfield land

Linked to the above issues, by removing an allocated site and redistributing the housing to existing allocations (i.e. rather than allocating a new site somewhere else) means that whilst the overall growth target is still achieved, less land is used to do so. This has considerable sustainability benefits of making efficient use of land and reducing the loss of agricultural land, which in the case of N E March is predominantly Grade 2 ('very good'). It is also useful to note that, as pointed out in the published Sustainability Appraisal report, the south and east of March (where other allocations are located) are a mixture of Grade 2 and 3, therefore land quality is still good but not quite as good as N E March.

Rationale 5: Where a choice is available

Aside from sustainability issues and deliverability issues as described above, it is worth noting that a Council, when faced with several reasonable alternative sites, can choose one site over another. It does not have to allocate all available land if does not need to. In this regard, it is not unreasonable for the Council to decide that, on balance, the merits of allocating the N E March site are not seen as favourable as other sites. On that basis, it is not unreasonable for the Council to propose not to allocate N E March.

Part 3: Schedule of Changes to the Proposed Submission Core Strategy (February 2013)

Note: The changes set out below should be read in conjunction with the original proposed submission version of the Fenland Core Strategy (Feb 2013).

Crossed through text, such as this crossed through, means the text is proposed to be deleted

Underlined text, such as this <u>underlined</u>, means the text is proposed to be added.

Amendment 1: Amend Paragraph 3.5.6 (Page 20) as follows:

3.5.6 It is estimated that 1,630 properties will come forward in the plan period from April 2012 on specific sites which are already committed (i.e. dwellings completed post April 2012, or on sites with planning permission where work has not yet started or is partially completed). In addition it is estimated that approximately 2,165 dwellings will come forward on sites which meet the criteria based policy set out below but are of a scale too small to identify as a broad or specific location of growth on the Policies Map and Key Diagrams linked to policies CS8-11.

Amendment 2: Amend Policy CS9 – March (Page 44) as follows:

Policy CS9 - March

March, alongside Wisbech, is a focus for housing, employment and retail growth. All development should contribute to maintaining and improving March as a strong, safe and community focussed market town, preserving, enhancing and making appropriate use of its heritage assets to benefit its regeneration and sense of place.

There is a strong desire to provide a new multi-functional country park in March as a town and district-wide facility. The Council will explore options to assess the deliverability of a country park, with the chosen site to be determined on financial and deliverability grounds in addition to its potential for achieving a successful country park.

New urban extensions to March will be supported in the following locations:

North-east March (open space, play and enabling development - strategic allocation): This area, as identified on the Policies Map, currently serves, in part, as an important community area for open space, leisure and recreation. The remaining area is predominantly under agricultural use. The Council's vision for this area is for enhanced open space, leisure and recreational facilities, both in terms of size and quality of such facilities.

In order to deliver such enhancements, and to help contribute to the wider growth requirements of this Core Strategy, new housing-led development will also be permitted in this overall allocated area, in accordance with Policy CS7.

For the avoidance of doubt, no new development will be permitted if there is no net gain in open space, leisure and recreational facilities within the allocation area.

A Transport Assessment will be required as part of a comprehensive delivery scheme and planning application for this site. Such an assessment may find that for this allocation site to proceed it will require the delivery of, or a contribution towards the delivery of, a northern link road as identified in the March Market Town Transport Strategy.

The comprehensive delivery scheme prepared in accordance with Policy CS7 for this allocation will determine, amongst other matters:

- the precise quantity, quality and location of open space, play and recreation
 facilities in this locality (which may, in whole or part, not necessarily be located in
 the area currently serving this function, but would be located within the allocation
 area):
- the quantity of housing growth (and any other uses), though it is envisaged that around 450 new dwellings will be forthcoming in this area:
- key on and off site infrastructure needs (such as access and transport arrangements, including good cycle and pedestrian links provided towards the town centre and railway station), including an appropriate timetable linked to development phasing;
- the demarcation/safeguarding of the Fens Causeway; and
- the provision of suitable landscaping along the north and eastern boundary of the area.

South-east March (strategic allocation):

[no change to policy for this site]

South-west March (broad location for growth): this area is located to the east of the A141, south of Knights End Road and west of the B1101. It is expected the area will be predominantly residential (around-300 500 dwellings), but also include some business development, probably in the southern part on the west side of the B1101. The most important archaeological features should be retained and used for informal open space or other uses which preserve their integrity. The setting and character of Barn Owl Lodge should be retained. Noise and landscape mitigation measures should be provided along the A141 as appropriate. The design of the development at the southern end of the area will be particularly important as a key gateway entrance to the town.

West March (strategic allocation):

[no change to policy for this site]

March Trading Estate (broad location for growth):

[no change to policy for this site]

[no change to remaining parts of the Policy].

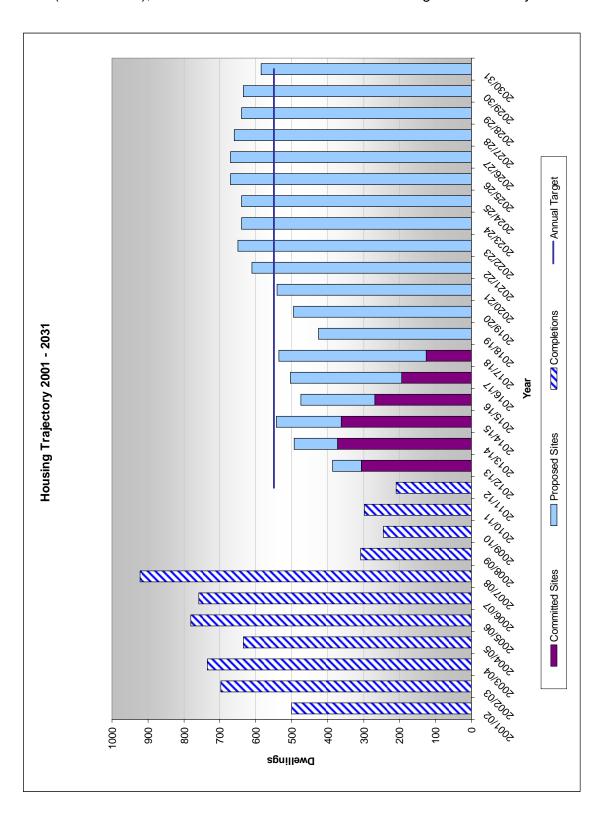
Amendment 3: Amend paragraphs 7.3.11-12 (Page 94) as follows. Please note that this amendment also corrects some mathematical errors in the Proposed Submission version of the Core Strategy (as indicated by*). These errors have no material effect on policies of the Core Strategy but are included here for completeness.

7.3.11 - In addition, the Core Strategy also sets out an allowance for 'CS4 – Part B Sites'. These sites reflect the criteria based approach as set out in Part B of CS4 that allows appropriate new housing sites to come forward that fit with the Council's spatial strategy, but are of a scale too small to identify as specific or broad locations of growth. This allowance is expected to include those remaining sites previously allocated through the 1993 Local Plan, those that come forward on the redevelopment of vacant sites and small scale proposals in Towns and Villages. To ensure that this approach brings forward sites as predicted careful annual monitoring will be undertaken. It is expected that at least 2,165 2,265 dwellings will come forward through this approach.

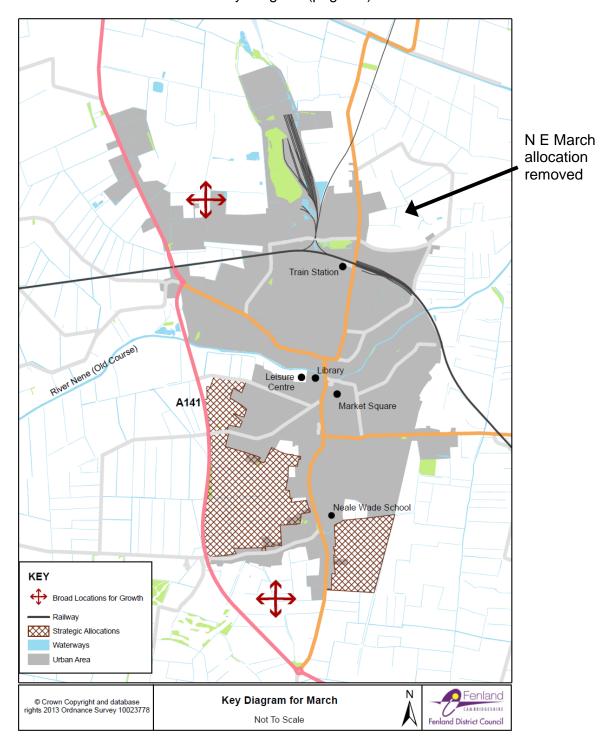
7.3.12 The housing target is therefore expected to be achieved through the following:

	Wisbech	March	Chatteris	Whittlesey	Other Areas	Total
		3,050		_		5,600
Strategic Allocations	900	2,600	1,150	500	0	5,150
	1,100	300				1,400
Broad Locations	<u>1,150*</u>	<u>500</u>	100	0	0	<u>1,750</u>
Extant Planning Permissions	431	478	170	113	438	1,630
	515	350				2,165*
CS4 Part B Sites	<u>465*</u>	<u>600</u>	145	355	700	<u>2,265</u>
Net Completions 11/12	54	22	34	34	65	209
Total	3,000	4,200	1,599	1,002	1,203	11,004

Amendment 4: Replace the existing district wide Housing Trajectory (page 95) with the following trajectory. This shows only relatively minor changes. These changes arise from the deletion of North East March site (was estimated to start in 2014/15 and finish 2028/29), the increase in dwellings and slightly adjusted later start date at South West March (start in 2021), and the increase in 'windfall' sites coming forward in all years:



Amendment 5: Amend March Key Diagram (page 47) to as follows:



Part 4: Schedule of Changes to the Proposed Submission Sustainability Appraisal report (February 2013)

Note: The changes set out below should be read in conjunction with the original proposed submission version of the Sustainability Appraisal report.

Crossed through text, such as this crossed through, means the text is proposed to be deleted

Underlined text, such as this underlined, means the text is proposed to be added

Amendment 1: Amend text within box entitled 'Locations Identified for Growth' for the March area, as set out on page 15 of Part 2 of the Sustainability Appraisal report (February 2013), to as follows:

Locations Identified for Growth:

Assisted by the above appraisal, plus taking into account other planning and deliverability factors, the Council has proposed to take forward development in three segments, mainly in the southern segment, a small amount in the west and two areas one area in the north segment. The east segment has been discounted (to a lesser or greater degree depending on the location within the east segment) on matters raised in the appraisal, flood risk, definable boundaries and a lack of significant landowner interest. Detailed boundary considerations are set out in Section 8.

Amendment 2: In the box on page 60-61 of the Part 2 of the Sustainability Appraisal report (February 2013) entitled 'Assessment', which relates to the appraisal of the North East March site, amend the last paragraph to as follows:

Assessment

[no change to first six paragraphs]

There is developer interest in the area and taking known constraints into account the Council is sufficiently confident that development would be deliverable. The area is therefore included as a strategic allocation in the Core Strategy.

However, whilst development appears deliverable in this locality, other suitable development sites also exist in March. As such, the Council has determined that these alternative suitable locations are, on balance (taking account of factors raised in this sustainability report and the need to maximise the efficient use of land), more appropriate to take forward as allocations in the Core Strategy in order to meet the growth targets for March and Fenland as a whole. The area is therefore not included as a strategic allocation in the Core Strategy.

Part 5: Schedule of Changes to the Proposed Submission Habitats Regulations Assessment Screening Report (February 2013)

Note: The changes set out below should be read in conjunction with the original proposed submission version of the Habitats Regulation Assessment Screening Report.

Crossed through text, such as this crossed through, means the text is proposed to be deleted

Underlined text, such as this underlined, means the text is proposed to be added

Amendment 1: Amend the second row on page 23 of the Habitats Regulations Assessment Screening Report to as follows:

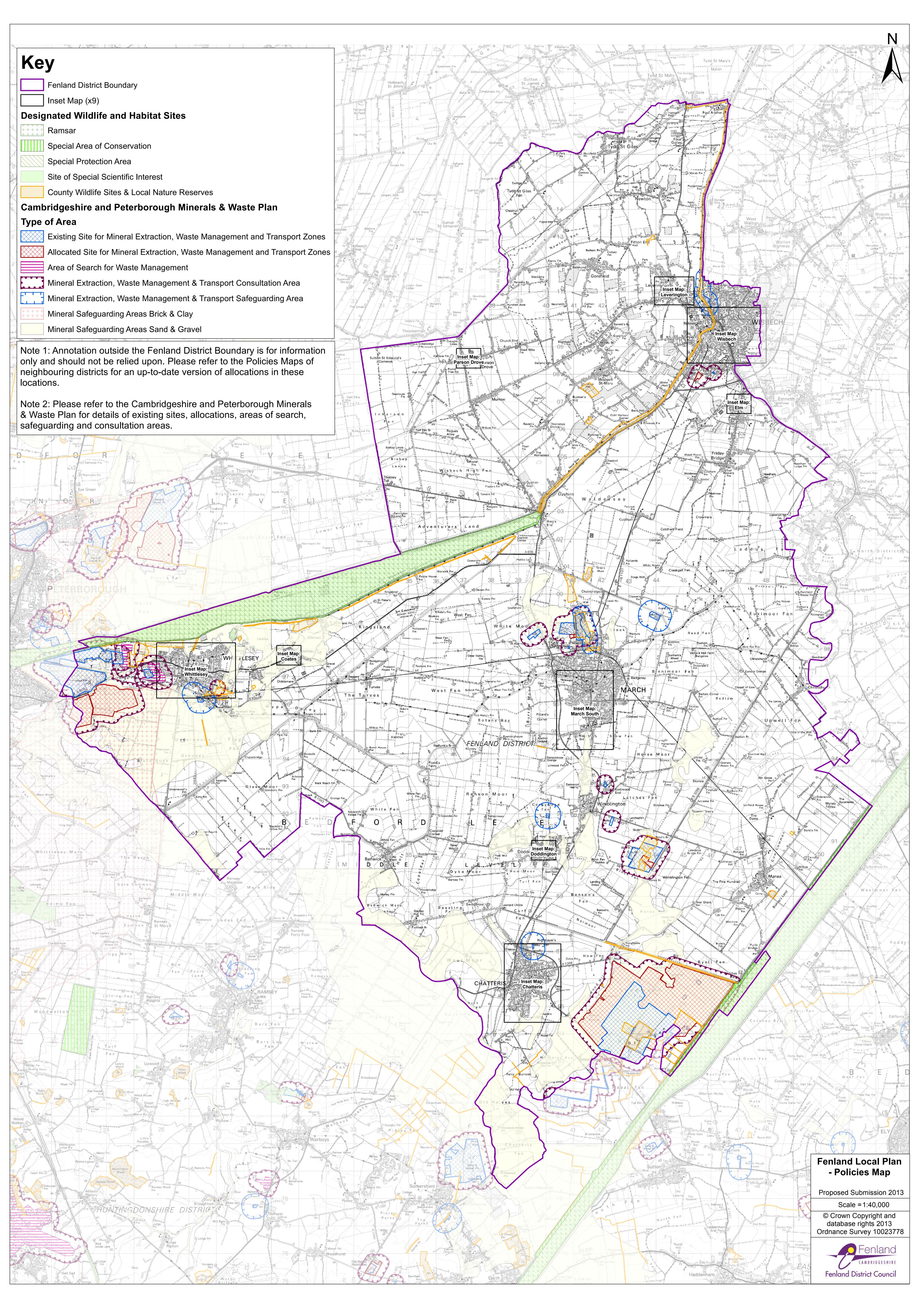
CS9 – March

This policy, and the associated map of locations of growth for March, identifies where growth (housing and employment) will be located in the form of urban extensions to March. March is not very close to a N2K site, the closest being the Nene Washes about 4km to the north west. The precise location of growth around March, therefore, may be sensitive to that N2K site, especially if a location for growth would reduce such a separation distance. However, locations for growth identified are predominantly to the south and west i.e. broadly in the opposite direction from the N2K site. A broad location for growth is indicated to the northwest of March, but this is focussed on the existing employment area and would not reduce the separation distance between March and the Nene Washes. A Strategic Allocation is also located to the north-east of March, but this The policy has a strong emphasis on the creation of high quality open space, which would help direct leisure and recreational activities away from N2K sites. As such, overall, the policy can be screened out from any Appropriate Assessment of the Core Strategy.

Part 6: Amendment of the Proposed Submission Policies Map (February 2013)

Please see attached revised Policies Map which now no longer proposes to include a 'March North' inset map.

The 'March North' inset map is therefore also proposed to be deleted.



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