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

Dear Sirs

**Re: Fenland Local Plan Core Strategy
Proposed Submission Addendum 2013
Representations by Maxey Grounds & Co on behalf of The Wilkinson Family**

Further to your publishing for consultation the proposed Addendum to the Fenland Local Plan Core Strategy, I would wish the following comments made on behalf of my clients, one of the landowners at north-east March, to be taken into account as an objection to the proposed changes, in the further deliberation of the Plan.

I consider the Plan to be unsound with the proposed changes for the reasons given below and propose that the further amendments listed below be made to the Plan to address this unsoundness.

I also confirm that it remains my wish to be a party to the Examination in Public in relation to the overall housing strategy for Fenland and specifically for March when this takes place with the Inspector.

The **Rational 1** for proposed change suggests that the deletion of north-east March is compatible with the high level sustainability appraisal. The conclusions of the sustainability appraisal on page 15 do indicate that south March should be considered first if possible but that opportunities could be explored in all three other segments. It was primarily because of the greater certainty of delivery elsewhere that north-east March was considered as a strategic allocation (as opposed to an area of broad growth), in the February 2013 Proposed Submission Core Strategy, which Fenland District Council adopted as both sound and lawful. It is my submission that the Council are bowing to local objector pressure in seeking to exercise discretion to remove this allocation, rather than for good planning reasons, and to make amendment on such grounds is unsound because it gives precedence to the voice of one sector of the community over and above the remainder who are being required to await the examination in public before being able to express their views.

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Rational 2 suggests that south-west March is more sustainable than north-east March. This is disputed. Using the traffic light system of the Sustainability Appraisal south-west March has four red categories as opposed to north-east March having three, whilst the red and orange are equivalent. North-east March has 10 ½ bright green categories compared with south-west March 10. It is suggested that many of the poorly scoring categories of south-west March will change if development occurs in the south and west of the town but this is disputed because what will not change is the distance from the station, the employment areas, the town centre, nor the shape of the town created by such development. It is submitted that the Council are seeking to make an argument around their latest proposals rather than truly analyse, as they did originally, the Sustainability Appraisal in terms of formulating proposals made on good legitimate planning grounds. This is an amendments driven by politics, not by planning reasoning.

Rational 3 Redistribution of Housing Growth. North-east March was included as a proposed allocation because it was highly likely it would be delivered early in the plan period. South-west March conversely is unlikely to deliver any additional growth, if its target scale is increased, until the end of the plan period. This will affect delivery of the housing that is needed in the area.

The suggestion that an additional 250 windfall units can be created, when the original target of 350 was considered sound by the Council, is not considered credible. It is described in the document as optimistic. Windfall units are those that come forward generally on small scale sites often from redevelopment, and windfalls tend to increase in numbers when values rise, rather than in times of low value such as present. The Plan is considered unsound in that there is a significant risk of under achieving the new proposed windfall target of 600 units.

Rational 4 effectively suggests that increasing the density on other allocation sites is more efficient use of land. This however prejudices the environment that it can be created by developers within these other sites because of the need to increase density and thereby probably reduce open space and environmental features within those developments. Given the intent of the Council is to promote good design and attractive neighbourhoods in which to live, it is considered that this proposed increase in numbers on existing target sites is contrary to other aspects of the core strategy.

Rational 5 It is acknowledge that the Council do have choice in what they support. However Officers having recommended the previous version of the plan sound and that policy having been adopted by the Council, there needs to be good planning reasons put forward as to why they should change from that position. So far, no planning reasons are being advanced, purely because the Council are reacting to an organised group of local residents in the area rather than listening the views of the community of Fenland as a whole.

Proposed amendments to the Core Strategy to address these objections

It is proposed that the playing field at Estover Road, which we have previously indicated we consider inappropriate to be developed or included in the allocation, should be deleted from the original north-east March allocation and Policy CS9 should be re-worded to identify this important open space as to remain protected from development and as an important community area within north-east March.

It is proposed that the remainder of the original north-east March allocation should be re-instated, but with a reduced target level of growth to 300 new dwellings to reflect the reduced area of land. The original wording of Policy CS9 for north-east March should be re-instated subject to the above changes and changes to the allocation plan and March key diagram reflecting these changes. This would give a strategic allocation target total of 2900 dwellings for March (originally 3050, now proposed 2600).

It is further proposed that the broad locations target be increased from 300 to 350 representing a marginal increase in numbers in south-west March, (originally 300 now proposed 500), it is further proposed that the CS4 Part B sites for March be increased from 350 to 450, a compromise between the original 350 described as conservative and the now proposed 600 described as optimistic.

Thus the total proposal for March of 4200 remains unchanged.

The amendments proposed and lower level of growth for north-east March of 300 will address the issue of potential loss of the playing field, which was always an ill conceived proposition, whilst making provision via S106 contributions for some enhancement of the facilities of the existing facility. It will also, by its reduced scale, reduce the load on the infrastructure of the area, to what is considered to be manageable levels, without losing an allocation of housing in close proximity to the railway station and the employment areas of the town. 300 units on this area will enable a range of types of dwellings to be provided in a pleasant environment, avoiding any Flood Zone 3 areas, and in a sustainable manner in accordance with the original conclusions of the Council regarding development of this area.

Attached are my suggestion rewording of the policy and an annotated version of the March key diagram setting out the proposed changes.

Yours sincerely,



J R MAXEY MA (Cantab) FRICS FAAV
For and On Behalf of Maxey Grounds and Co LLP

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, **the Estover Road Playing Field is excluded from this 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 (**including** the area currently serving this function);
- the quantity of housing growth (and any other uses), though it is envisaged that around **300** 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): this area is identified on the Policies Map and is expected to be predominantly residential (around 600 dwellings) and include provision for new sports pitches for Neale Wade Community College. Direct cycle and pedestrian routes should be provided to the Community College. Some fairly significant surface water attenuation features to mitigate local flood risk are likely to be necessary. The design of the development, including enhanced landscaping, will be particularly important at the southern end of the area.

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 350 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): this area is identified on the Policies Map. It is expected

the area will be predominantly residential (around 2,000 new dwellings) with potentially some

business provision gaining access from the A141. The comprehensive delivery scheme for the area should show how development will relate acceptably to the strategic and local highway network, including the town centre, as well as indicating direct sustainable transport

links to the north of the town, the town centre and Neale Wade Community College. Noise and landscape mitigation measures should be provided along the A141 as appropriate. Education provision will be necessary and local convenience shopping will need to be provided. Opportunities should be taken to add to the area of open space currently forming part of the Recreation Ground in The Avenue as a focus for the community. Some fairly significant surface water attenuation features to mitigate local flood risk are likely to be necessary. The most important and best examples of archaeological features will be retained

and used for informal open space or other uses which preserve their integrity. The design solution for this site should pay particular attention to the need to protect and enhance the setting the Church of St Wendreda's and the cluster of listed buildings around it, maintaining 46

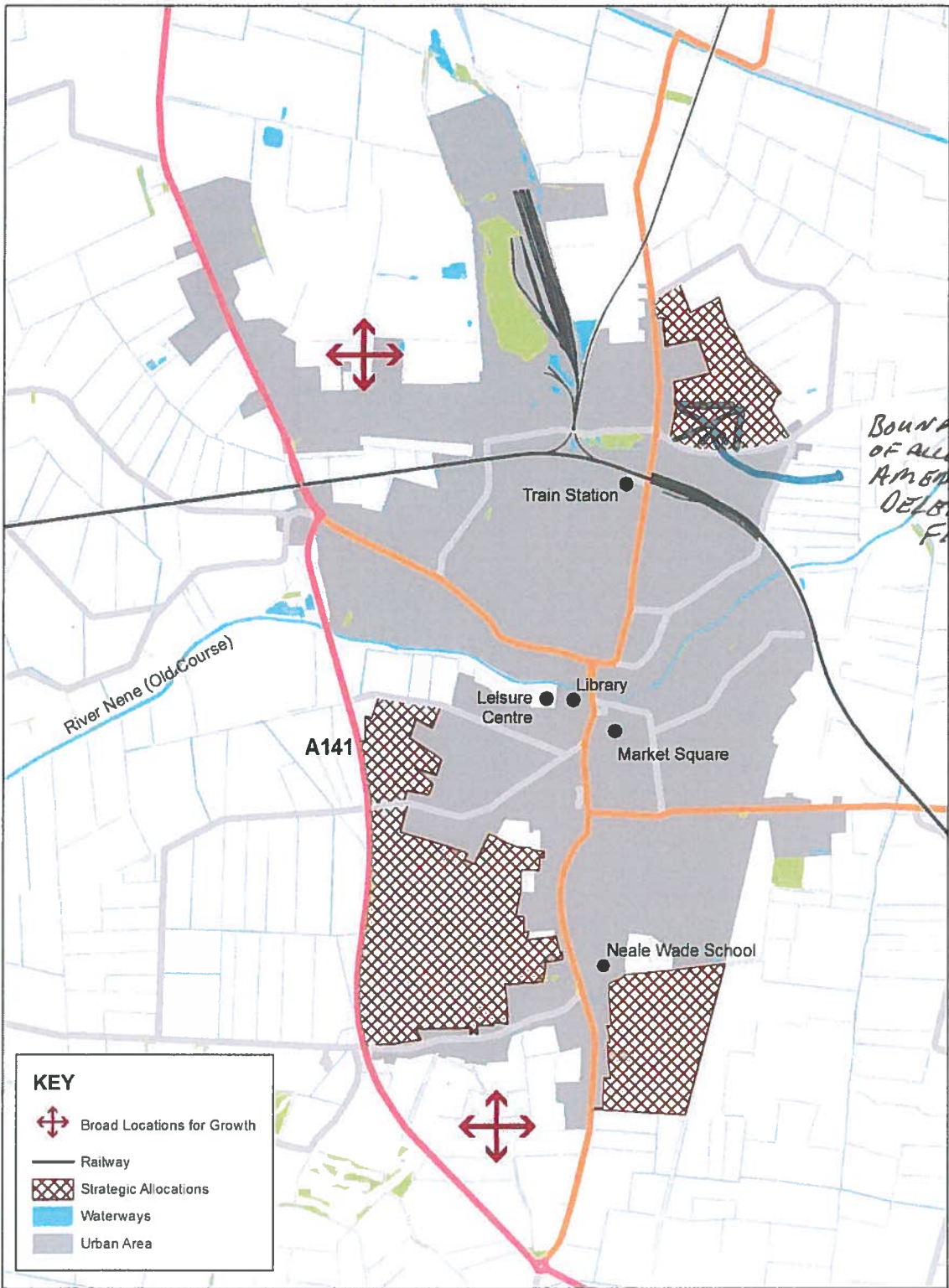
the rural character of the immediate area and preserving views of the church at intervals from the south and west.

March Trading Estate (broad location for growth): this area is located in the north west part of the town east of the A141, west of Hundred Road and north of the railway line.

Subject to flood risk, highway and amenity issues, and other relevant policies in the plan being satisfactorily addressed, it is expected that development in this area will be predominantly or entirely related to business uses. Should proposed schemes include any part of the Fens Causeway, this will be demarcated and if necessary safeguarded. New development should ensure that a substantial gap is retained between the area and dwellings on the east side of the A141 in Westry.

To help drive forward the development of March, and to assist the integration of the urban extensions into the town, the Council will prepare a town strategy covering a wide range of matters, including non town planning matters such as service provision, with a focus on the town centre. Once adopted by the Council, this town strategy will be an important material consideration in the determination of all planning applications in the town.

The sewerage infrastructure network is currently at or near capacity, particularly in the southern and western parts of the town, and development proposals will need to address this.



KEY

	Broad Locations for Growth
	Railway
	Strategic Allocations
	Waterways
	Urban Area

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Key Diagram for March

Not To Scale

