

July 2013

Fenland Local Plan – Core Strategy Proposed Submission Addendum (June 2013)

**Representations on behalf of the Master, Fellows and
Scholars of the College of St John the Evangelist
University of Cambridge**

and

Cambridge County Council (Estates)

Prepared by

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CAPL/301743/A3/AJH/MW



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1 Context

- 1.1 Savills (UK) Limited act on behalf of St John's College Cambridge (SJC) who are the owners of the majority of the land within the strategic housing allocation for North East March (Policy CS9) contained within the Fenland District Council Core Strategy (Submission Version – February 2013). Savills also act for Cambridgeshire County Council (Estates) (CCC) who are the owners of the Estover Sports ground which also form part of the allocation. Savills do not represent the Wilkinson family who own the other part of the land identified in the allocation.
- 1.2 In February 2013 Savills made representations on behalf of our clients supporting the allocation of North East March (Policy CS9) within the Submission Version of the Fenland District Council Core Strategy (Core Strategy) for residential development. North East March was identified as a strategic allocation capable of delivering circa 450 houses and enhanced recreational and sports fields. Within our representations to the Core Strategy we questioned whether the entire identified area would be required to deliver an aspiration of 450 houses with enhanced recreational facilities. Without repeating all of our previous representations here, we made it very clear to Fenland District Council that the St John's College land and Cambridgeshire County Council land were capable of delivering up to 450 units, excluding the Wilkinson family landholding (which falls within the functional flood plain). Our representations were also accompanied by a Viability Assessment of the revised allocation and some indicative masterplans to illustrate how the site could deliver up to 450 houses whilst also retaining the Estover sports fields as a community sports facility.
- 1.3 The representations were also supported by various technical assessments in relation to transport, ecology, archaeology and drainage all of which used in the formulation of the indicative masterplans. There was no 'show stoppers' identified through our own independent technical assessments which concluded that the delivery of this site would be acceptable in terms of highways, access, ecology, drainage or archaeology issues. Furthermore, the representations made by our clients demonstrated that the delivery of this allocation was likely to come forward early in the Plan period as it is within the ownership of two single landowners who are already working in co-operation to bring forward an appropriate allocation.
- 1.4 The Core Strategy identified Estover playing fields as part of the overall strategic allocation however it failed to set out within the policy wording that the Estover playing fields specifically should be retained. Many of the representations received to the Core Strategy consultation were objecting to the loss of the playing fields. This position has never been the case and the

representations we made to the Submission Core Strategy set out that it would be in the intention of our clients to work together in order to ensure that Estover playing fields are both retained as a community asset.

- 1.5 We also confirmed that the key issue of any sports provision at Estover Road in the long term would be its future management and being self sufficient therefore it is essential that development comes forward at North East March to enable some capital receipts to retain the Estover playing fields. Our representations also clearly identified that we would be seeking a net gain of open space for leisure and recreation within the allocation area.

2 Proposed Submission Addendum – June 2013

2.1 Our clients expressed their “surprise and disappointment” at the timing of an announcement by Alan Melton (Leader of Fenland District Council) to recommend the proposed strategic allocation of North East March was to be removed from the Submission Version of the Fenland Core Strategy. This announcement was made during the consultation on the original Core Strategy which we considered at the time to be an unusual approach from the District Council given that we have reached the submission stage and all of the allocations already been through a thorough sustainability appraisal. Our clients are now responding to the Proposed Submission Addendum (June 2013) which seeks to delete the allocation of North East March from the Submission Version of the Core Strategy. The decision to move this motion forward and to hold the consultation was taken at Fenland District Council Cabinet on Thursday 30th May 2013. A copy of the Cabinet Minutes are enclosed at **Appendix 1** and they provide a commentary of the debate which was undertaken at the Cabinet meeting at which point where Fenland District Council Members voted to uphold the motion for the deletion of the North East March allocation (Policy CS9).

Cabinet Meeting

2.2 From the cabinet notes and statements by Cllr Alan Melton at the Cabinet Meeting, the deletion of the North East March allocation appears to have come from concerns raised from local people about the allocation rather than from any suggested change in circumstances with the site. There are no references within the Cabinet meeting minutes to any changes in circumstances in relation to the allocation itself or in terms of its ranking in terms of sustainability when compared to the other strategic sites within the town of March. We therefore believe that Fenland District Council made this decision to delete the allocation on the views of local members and the public alone rather than through any change in circumstances. We can confirm as landowners that there have been no changes at the site since the original sustainability appraisal was completed. We are not aware of the circumstances where the Council has taken this approach anywhere else and therefore question whether it is valid for a strategic allocation to be removed once a Core Strategy is at consultation state given that the Core Strategy in Fenland has been prepared over a number of years and has been through numerous rounds of consultation and assessment.

2.3 In our view all of the strategic allocations and broad locations for growth identified in the Core Strategy at March have a number of objections from the public and in terms of sustainability each strategic allocation has both positive and negative factors which relate to it. In our view

this makes the decision to delete this allocation unjustified given that the Core Strategy Sustainability Appraisal 2013 prepared by Fenland District Council confirms that the site at North East March should be allocated for residential development on the basis of the findings of this Sustainability Appraisal and due to its preference over other excluded locations.

Strategic Grown Location – March

- 2.3 In order to see if the deletion of NE March allocation is justified in sustainability terms we must understand how it compares to other strategic sites. Within the Submission Core Strategy Sustainability Appraisal 2013, page 11 (see **Appendix 2**) there is a sustainability assessment of the proposed strategic locations at March. This appraisal compares the sustainability criteria of the four strategic directions of growth at N March, S March, W March and E March. An assessment of each direction is undertaken in relation to a number of criteria which include land and water resources, biodiversity, landscape and cultural heritage, and healthy, inclusive and successful communities.
- 2.4 The conclusions of this overarching assessment are that the four strategic directions of growth compare very favourably in terms of the sustainability criteria applied in the assessment. Each of the four strategic sites require the loss of undeveloped land however, in all of the other criteria assessments the sites are relatively identical and contain the same neutral effects.
- 2.5 However we can also conclude that the most significant positive effects were attributed to growth at N March. The land to the north of March is identified as having a minor positive effect in relation to biodiversity compared to no effect on the sites to the south, east and west. The land to the north of March is also identified as being the most likely as having the most positive effect in relation to economic activity whilst compared to minor positive effects for south, east and west locations. All of the other criteria in the assessment are ranked as equal to the other four locations for strategic growth. From this initial assessment of the locations for strategic growth at March, land to the north of the town was identified as being the most sustainable (given the ranking applied in the assessment) when compared to the other locations in the town.

Site Specific Allocations

- 2.6 Page 26 onwards (see **Appendix 3**) of the Sustainability Assessment then goes on to appraise the individual locations for strategic allocations and broad locations for growth which have been identified within Fenland District Council including March. In seeking to establish

where strategic allocations and broad locations should be located the assessment identified a wide number of factors in assessing the sites sustainable credentials including:

- Whether isolated or adjacent to existing settlements
- Impact on landscape character and open countryside
- Impact on heritage assets
- Impact on designated nature sites and other known biodiversity
- Proximity to key services including town centres, local schools, local convenience shopping and employment areas
- Impact on the methodology of the town
- Whether a Green Field or brownfield site with agricultural land and grade effected
- Flood Risk
- Land contamination
- Impact on waste including safeguarded areas
- Potential to provide road access and opportunities to link to existing cycle networks
- Potential to improve lives of existing residents and create healthy sustainable communities
- Potential to provide or utilise existing open space
- Likely infrastructure required to facilitate developer interest

2.7 Furthermore, the Sustainability Assessment confirmed that site visits were undertaken for all of the candidate areas to help clarify the process and to determine accuracy of its use such as relating to on-site specific features.

2.8 A scoring system of constraints was then applied to each criteria.

March North East Sustainability Appraisal (see page 57 of Core Strategy Sustainability Document)

2.9 The Sustainability Assessment undertaken for North East March looks at a wide range of criteria; however, there is nothing within the assessment which identifies that this site is not capable of being delivered for the purposes of 450 houses as set out within the original Submission Version of the Core Strategy. The conclusion of the assessment identified that North East March should be included as a strategic location for growth within the Core Strategy based on the evidence set out within sustainability criteria. No evidence has been produced by Fenland District Council that the circumstances on this site have changed from the point when it was included as a strategic allocation up until a point where a suggestion was made that it should be deleted from the Core Strategy. The Council have not made any

amendments to their Sustainability Appraisal in advance of deciding to try and delete the North East March allocation and have therefore sought to amend the Sustainability Appraisal through the Addendum Consultation following a decision to delete the allocation. This approach seems to indicate that they are making the sustainability report fit to the conclusion in which they wish to reach in deleting the North East allocation rather than using the sustainability criteria to assess which is the most appropriate site; which is what they did originally within the when they decided that this allocation should be identified within the Submission Version in the first instance. The Council have therefore, in the view of our clients, acted inappropriately in seeking to delete an allocation without any evidence base to support such a deletion.

Table 1 below is a comparison of the sustainability ranking of the four preferred strategic housing sites within March taken from the sustainability appraisal. Each allocation is very similarly ranked containing both significant and major constraints however in comparing the assessment below it would be difficult to confirm which of the sites was least sustainable and in our view NE March is not a stand out location for deletion when compared to the other locations. It is also questionable why the NE March site is ranked as having more significant impact than the rival sites for waste water when the town is served by the same waste water facilities and is providing fewer units than two of the other strategic sites.

	March North East	March South East	March South West	March West
Proximity to Key Services - walking / cycling				
Distance to Town Centre	Red	Orange	Orange	Green
Other convenience shopping	Green	Green	Green	Green
Major employment area	Orange	Red	Red	Red
Secondary school	Red	Green	Green	Green
Primary school	Orange	Green	Red	Green
Railway Station	Green	White	Red	Red
Definable Boundaries	Green	Green	Green	Green
Impact on Town Morphology (Shape)	Green	Green	Orange	Green
Land Resource				
Greenfield / Brownfield	Red	Red	Red	Red
Flood Risk	Green	Green	Green	Green
Contamination	Green	Green	Green	Green
Grade of Agricultural Land	Orange	Orange, Green	Orange, Green	Orange, Green
Minerals and Waste Issues				
Mineral Safeguarding Areas	Orange	Green	Orange	Green
Waste Water Treatment Work Safeguarding Area	Green	Green	Green	Green
Transport Safeguarding Area	Green	Green	Green	Green

Waste Site	Light Green	Light Green	Light Green	Light Green
Waste Safeguarding Area	Light Green	Light Green	Light Green	Light Green
Environmental Issues				
Landscape Character	Medium Green	Medium Green	Medium Green	Medium Green
Historic Features	Orange	Dark Green	Red	Orange
Proximity to Ramsar, SPA, SAC Sites	Medium Green	Medium Green	Medium Green	Medium Green
Sites of Special Scientific Interest (SSSIs)	Medium Green	Medium Green	Medium Green	Medium Green
Local Nature Reserves	Light Green	Light Green	Light Green	Light Green
County Wildlife Sties	Medium Green	Light Green	Light Green	Light Green
Other known Biodiversity features	Light Green	Dark Green	Dark Green	Dark Green
TPO Trees	Orange	Light Green	Orange	Light Green
Public Open Space	Light Green	Medium Green	Medium Green	Medium Green
Noise Pollution	Light Green			Medium Green
Available Infrastructure				
Transport - Roads	Light Green	Dark Green	Medium Green	Medium Green
Transport - Foot and Cycle Ways	Medium Green	Medium Green	Medium Green	Medium Green
Transport - Public Transport	Medium Green	Medium Green	Medium Green	Medium Green
Waste Water Treatment Works	Red	Orange	Orange	Orange
Capacity of Sewer Network	Red	Orange	Orange	Orange
Electricity Provision	Medium Green	Medium Green	Medium Green	Medium Green
Gas Main Connection	Light Green	Light Green	Light Green	Light Green
Water Usage and Connections	Light Green	Light Green	Light Green	Light Green
Deliverability	Medium Green	Medium Green	Medium Green	Medium Green

Submission Addendum

Key	
No known constraints	Light Green
Minor constraints - should be possible to address, and/or utilise	Dark Green
Medium constraints - should be possible to address	Medium Green
Major constraints - detailed assessment required - proceed with caution	Orange
Significant constraints - unable to overcome	Red

2.10 Based on the evidence set out within the original Sustainability Assessment above there appears to be no justification on sustainability terms for the deletion of the allocation of North East March. No subsequent evidence or change in circumstances have occurred which would alter the assessment above.

Fenland District Council Proposed Rationale for the Proposed Change

- 2.11 Fenland District Council set out a number of rationales for the proposed deletion of the proposed North East March allocation and we would like to address each of those in turn in the following paragraphs.

Rationale 1: High Level Sustainability Appraisal

- 2.12 Fenland Council sets out that the Sustainability Appraisal concluded at a high level that growth should be identified in the southern segment of March first. In our view this does not justify the deletion of this particular allocation as a decision to build in South March first is only based on the Council's assumption that there was developer interest in the site already. In reality once the strategic allocations are identified it would not be in the Council's control as to which of the strategic sites would come forward first as this would be a commercial decision in the hands of the developers who are building out in different locations. There is no sustainability criteria identified which suggests that delivery of the sites identified to the south of March should come forward ahead of the sites to the north of March. We therefore do not agree that the deletion of North East March with the potential growth shifting to the south is a reason which can be used to justify the deletion of the allocation which already been found to be acceptable through the Sustainability Appraisal to which is being referred.

Rationale 2: Sustainability Appraisal and Detailed Site Options

- 2.13 As confirmed within the details of this rationale it was concluded that the allocation at North East March was a suitable site to take forward, in the Sustainability Appraisal.
- 2.14 Fenland Council are now subsequently stating that North East March sites scored poorly when compared to the other sites. However, it is unclear as to how Fenland District Council has reached this conclusion as whilst North East March scores down on one criteria it actually scores higher on other criteria. Table 1 clearly sets out that the strategic locations are generally equally ranked in terms of sustainability. This statement is therefore incorrect based on the findings of the sustainability report and does not justify deletion of the allocation. In our view there is no 'stand out' site within the four strategic sites assessed in terms of either the most or the least sustainable. The rationale set out here has been used to try and make a case for the deletion of North East March based on evidence which does not suggest this. After all as it clearly states in this addendum document, the conclusion of the Sustainability Appraisal was that North East March was a sustainable strategic location to take forward.

Rationale 3: Re-distribution of Housing Growth

- 2.16 At present the North East allocation is identified to contribute 450 houses during the plan period. These houses are sought to be lost through the deletion of the North East March allocation and Fenland District Council are suggesting that 200 of these houses should be moved to the SW March allocation, and 250 put into a wind-fall allocation.
- 2.17 Our clients reject the approach taken by Fenland Council in relation to the re-distribution of housing growth. At present the North East allocation as confirmed by our representations, is within two land ownerships with the majority of the housing land being delivered on the single ownership. We can confirm that this site is likely to come forward early in the plan period and that there are no physical on-site constraints which would prohibit it to do so. No technical evidence has been provided by objectors of Fenland DC to show the why the scheme is not deliverable and furthermore we have provided clear evidence that the scheme is fully deliverable from a technical perspective for the 450 houses as prescribed in the Core Strategy. Our own assessments of highways, ecology, archaeology and drainage undertaken by experienced consultants confirm that there are no “show stoppers” which would prohibit this site coming forward for development.
- 2.18 Our clients have also demonstrated through their representations that the allocation of North East March gives a number of positive sustainability benefits and also that it is in accordance with the National Planning Policy Framework (NPPF) objectives of being sustainable, viable and deliverable in the plan period. It is questionable therefore why Fenland District Council are seeking to remove 200 of these houses from a deliverable site to a site allocation at South West March which actually scores slightly worse in terms of sustainability than the NE March allocation. Furthermore, we understand this site may also be in multiple land ownerships and we therefore conclude that there maybe risk that it would not be able to come forward during the plan period. It would also appear that the requirement to deliver a further 200 units to this South West site would indicate that Fenland District Council has over allocated the size of this allocation as they have with NE March. In our view, it is not sustainable to move 200 houses from a site which we know is deliverable in a single ownership to a site which has been ‘over allocated’ in terms of size, is possibly in multiple land ownerships and scores worse in terms of sustainability.
- 2.19 Furthermore, given that the strategic Core Strategy sets out a requirement to deliver the majority of housing land at the strategic locations for growth, we see no evidence to suggest why there are any requirements to provide 250 houses on windfall sites. Given the size of the

strategic allocations and broad locations for growth at March there is no justification for windfall sites. The NPPF encourages sustainable communities and the release of random sites which have not been subject to sustainability assessment flies in the face of good planning practice in delivering sustainable communities.

Rationale 4: Efficient Use of Land and Protection of Greenfield Land

- 2.20 Rationale 4 makes the conclusion that the deletion of an allocation and redistribution of housing growth means that the overall growth target is to achieve using less land to do so.
- 2.21 Our client's representations to the Submission Version of the Core Strategy identified that we are seeking to reduce the overall size of the strategic allocation at North East March. Not all of the land identified by Fenland District Council is required for the delivery of 450 houses and we have suggested that the land in the ownership of Wilkinson which totals 6.68 hectares is removed from the strategic allocation. Our clients are therefore already seeking to reduce the amount of agricultural land which is used for the delivery of this allocation. We would also concede that by focussing this development in a single location would be a more efficient use of land than relying on 200+ houses to be found on windfall sites. It is also clear to say that there is Grade II land within all of the other strategic allocation sites (excluding North West March).

Rationale 5: Where Choice is Available

- 2.22 This rationale concedes that Fenland District Council when faced with several alternative sites can choose one site to develop.
- 2.23 Our clients would contest that the selection of sites during the preparation of the Core Strategy which has gone through numerous consultation periods would be the time to select sites. By the time the site is allocated in the submission version, all of the sustainability criteria will have been assessed and the Council should be in a confident position to allocate the appropriate sites. We therefore conclude at this stage that if the Council are concluding that the allocation at North East March that there sustainability criteria must be questionable given that they have decided to delete this allocation at a late stage after it has already been identified as one of their key locations for growth.
- 2.24 No evidence has been provided within the Addendum relating to the deletion of North East March to suggest that there has been any change in criteria which makes North East March less sustainable than the alternative sites it is our conclusion that the decision to delete North

East March is based on a political decision rather than using the sustainability criteria provided through the preparation of the Core Strategy. We therefore conclude that North East March should be retained and that the Planning Inspector during the forthcoming Examination should decide on the evidence of the sustainability appraisal and suggested alternative option whether this site should be deleted. In our view the Core Strategy cannot be found sound if at this stage the Council are still not confident over which sites they will be delivering at March, especially given that the site they are proposing to delete looks to be the most likely to come forward early in the plan period, given that it is unconstrained and that it is within dual land ownership. Whilst we acknowledge that there has been some objection to the development of this land, the majority of this objection has been received without the benefit of having read our representations to the Core Strategy which set out a reduced developable area and confirmation that Estover playing fields would be retained.

Conclusion

We would like to confirm that the NE March allocation is a viable, deliverable and sustainable strategic allocation. Fenland DC have failed to provide any evidence as to why this application should be removed from the Core Strategy at this stage of the process. We therefore would respectfully request that the allocation is retained so that it can be brought forward early in the plan period.

Appendix 1



Appendix 2



Appendix 3



Cabinet Minutes

Date:
Thursday 30 May 2013

Time: 2:00pm

Place:
COUNCIL CHAMBER,
FENLAND HALL

Please note: all Minutes are subject to approval at the next Meeting

Attendance Details

Present: Councillor A K Melton (Chairman), Councillor C J Seaton (Vice-Chairman), Councillor T R Butcher, Councillor J F Clark, Councillor S Garratt, Councillor P Jolley, Councillor S J E King, Councillor P Murphy, Councillor D C Oliver

By invitation of the Chairman: Councillors Cotterell, Chambers, Cornwell, Mrs French, Skoulding and Sutton

Item Number	Item/Description
PUBLIC	
C1/13	<p>TO SIGN AND CONFIRM THE MINUTES OF THE MEETING OF 25 APRIL 2013 <u>Previous Minutes - 2 Pages (80K/bytes)</u></p> <p>It was RESOLVED that the minutes of the meeting of 25 April 2013 be signed and confirmed.</p> <p>Councillor Melton welcomed Councillor Simon King to his first Cabinet meeting stating he was looking forward to working with him. Councillor King thanked Councillor Melton and said he was delighted to join Cabinet.</p>
C2/13	<p>FENLAND CORE STRATEGY - MOTION SUBMITTED TO COUNCIL <u>Report - 11 Pages (3M/bytes)</u></p> <p>Councillor Melton invited John Maxey to address Cabinet.</p> <p>John Maxey asked the following:</p> <p>'Can you please explain why it is necessary to seek to introduce at this stage in the process an amended draft Core Strategy, thereby delaying the process of adoption, rather than letting the EIP Inspector determine the plan in the light of objections, and is it appropriate for a decision to propose a revision to the Core Strategy to be</p>

Item Number	Item/Description
	<p>taken by a single Councillor without consultation with or the knowledge of either officers or colleagues.</p> <p>Planning is, or should be based upon an assessment of development needs of an area involving demographics, availability studies, criteria scoring, and recommendations from the professional planning staff. The report your officers have prepared points out that the alternatives score no higher, and that the idea that an additional 250 windfall units can be produced as if by magic in March is optimistic. In planning terms there is no overwhelming case in support of a change. It leaves officers arguing at the EIP that policies previously recommended as sound have now become unsound.</p> <p>The amendment will delay adoption of the whole Core Strategy, which we have been waiting 20 years for, by at least 4 months. With the alternative development likely to be later in the plan period, this will delay growth, and the meeting of housing need, and put back the housing provision profile.</p> <p>The issue of the announcement in the middle of the consultation period, a political response in the light of forthcoming elections, with a press release being issued at the same time as a Corporate Director was advising the Developers Forum, which I chair, that there would be no amendments to the Core Strategy as a result of consultation before EIP, is one that puts this Council in a poor light. The objections received regarding the North East March stem, and the report fails to mention the support received for the allocation, stems from a desire to see the planning field retained, and an announcement that councillors would ensure the master-plan for the area would be required to retain the sports field intact, a position I would support, would have achieved the same result, and would not need an amendment to the Core Strategy, It represents an ill considered reaction to an electoral issue.</p> <p>This is not about the specific site; it is about the principle and the process, and ensuring transparency within planning.</p> <p>So I repeat my question, is revision of the Core Strategy necessary, with the delay it brings to a plan awaited 20 years, and the risk that it will be found unsound because of the change from the evidence based recommendations. Is it appropriate for one Councillor to seek to change the statutory process towards adoption, without consultation with officers or colleagues, with the Examination will analyse the soundness of the plan, giving proper weight to all consultations on a planning basis rather than for political reasons. Why is a change necessary at this stage?'</p>

Item Number	Item/Description
	<p>Councillor Melton responded, stating the following:</p> <p>Members will be aware that I will put to Council later today a Motion which, in short, seeks the deletion of the March North East allocation in the Fenland Core Strategy. I thank all those Members, including Cabinet colleagues, who were willing to add their name to the Motion in order for it to be duly considered by the Council.</p> <p>As I stated at the Cabinet meeting in March, I fully support the ambitious grown plans we set out in our Core Strategy, but I also stated that I have been listening very carefully to the concerns that many people and local members have expressed, over the proposed allocation of 450 homes at the site known as North East March, off Estover Road. I share many of those concerns. I promised in March to bring back the Core Strategy to Cabinet and Council, and today I am meeting that promise.</p> <p>You will see in your agenda papers the Motion, plus some helpful commentary in a covering report. Cabinet should not consider the Motion lightly; it is an important decision which will affect people's lives, not only those who object to the site being allocation but, we must not forget, the landowners promoting the site for development.</p> <p>Nevertheless, I think it is right that Council debates this important issue and decides whether or not the site should continue to be allocated for development. And I think it is right that Cabinet assists Council in coming to a decision by stating what its collective view is.</p> <p>A Core Strategy should only be submitted for inspection when the Council is satisfied that it is both sound and reflects the vision and aspirations of local communities. I believe, as I have set out in my March statement, that the draft Core Strategy should be reconsidered as I am no longer convinced the NE March allocation is either sound or meets the vision and aspirations of local communities. We have sought advice from the Planning Inspectorate and Government's Planning Advisory Service who have confirmed that an amendment at this stage, as proposed today, is an acceptable approach and one which has been used by other Councils in a similar position.</p> <p>Before being issued to the press my statement to remove the North East March allocation was discussed and endorsed by Cabinet at its meeting on the 21 March 2013. It is entirely appropriate and in accordance with the Council's constitution for</p>

Item Number	Item/Description
	<p>a motion to be put forward to amend the Core Strategy. All Council members will be able to debate and vote on the motion later today. Should the motion succeed, a further six week consultation will be held on the proposed amendments towards the end of June.</p> <p>At no time was the decision taken on my own, it was with full consultation with the Corporate Management team and planning advisors therefore I certainly refute that fact that I acted alone.</p> <p>Councillor Clark added that he had voted in favour of the Core Strategy as it was and was not until he had spoken to those involved in the March Transport Strategy about identifying infrastructure which was understood could be incorporated within the Corporate Plan but that Cambridgeshire County Council had voted after and stated they were unable to make provisions for an eastern bypass. Due to localism and 645 residents that had made an excellent presentation of concerns regarding the traffic that would utilise Station Road to access schools and doctors at the southern end of town was he then swayed that it was not right to include it within the Core Strategy.</p> <p>It was DECIDED to recommend that Council accepts the motion (and thereby delete the March North East allocation in the Core Strategy).</p>
CONFIDENTIAL - ITEMS COMPRISING EXEMPT INFORMATION	
C3/13	<p>JOINT VENTURE WITH LINCOLNSHIRE COUNTY COUNCIL ("LCC") FOR SMALL CRAFT MOORINGS AT SUTTON BRIDGE Report - 4 Pages (63K/bytes)</p> <p>Councillor Seaton presented the Joint Venture with Lincolnshire County Council ("LCC") for Small Craft Moorings at Sutton Bridge report.</p> <p>It was DECIDED that:</p> <ul style="list-style-type: none"> • FDC lead on the procurement and delivery of the wet side works; • The attached Heads of Terms are agreed in principle; • The Corporate Director (Growth & Infrastructure) and Corporate Director (Finance), in consultation with Portfolio Holders for Economy and Finance, be delegated authority to agree the final Heads of Terms.

2:30pm

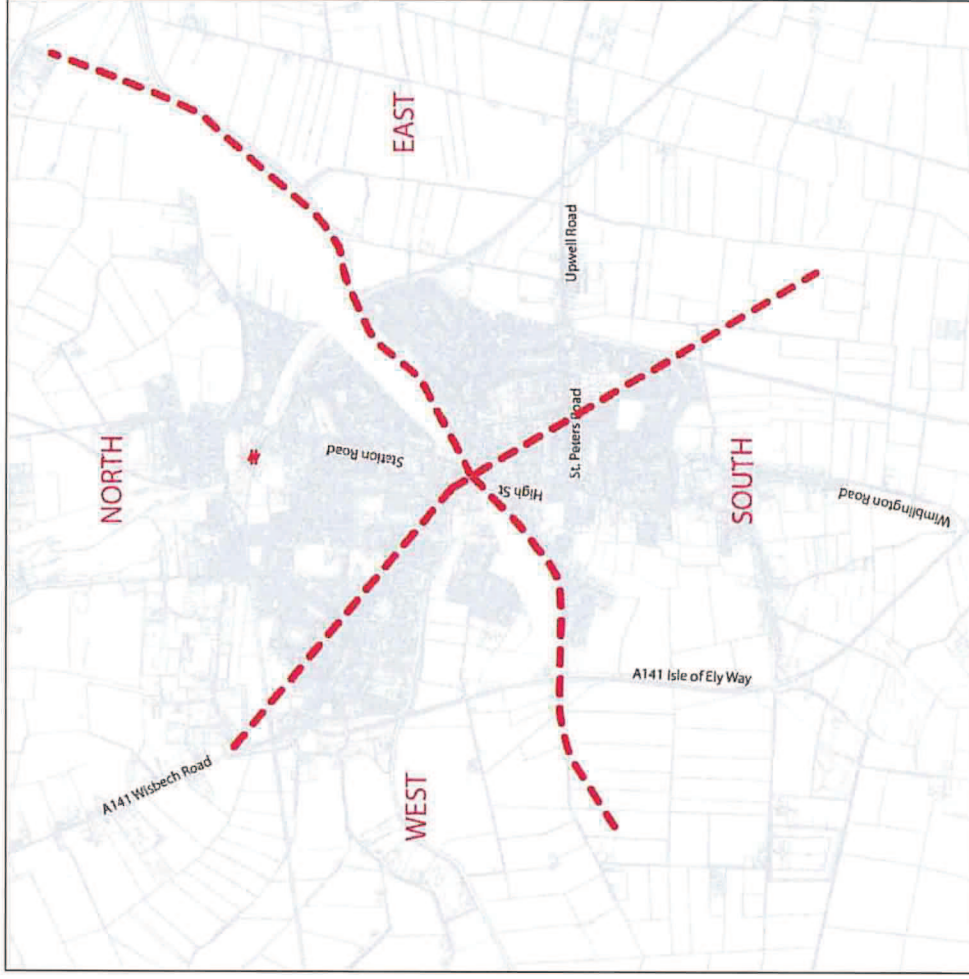
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5. Appraisal of potential locations for Growth at March

The map to the right illustrates the four broad segments which have been used as an area of search to identify opportunities for future development through urban extensions.

The tables on the following pages then appraise each segment using the sustainability objectives.



Appraisal of alternatives at March

Options →		Option 1 – March North		Option 2 – March East		Option 3 – March South		Option 4 – March West	
		Score *	Commentary / Explanation	Score*	Commentary / Explanation	Score*	Commentary / Explanation	Score*	Commentary / Explanation
SA OBJECTIVE: LAND AND WATER RESOURCES									
Sustainability Appraisal sub-objectives ↓									
1.1 Does the option minimise the irreversible loss of undeveloped land	-	Any development in this location likely to involve loss of undeveloped land. However, potential infilling in employment locations or railway land.	0	Any development in this location likely to involve loss of undeveloped land.	0	Any development in this location likely to involve loss of undeveloped land.	0	Any development in this location likely to involve loss of undeveloped land.	0
1.2 Does the option increase water efficiency and limit water consumption to levels supportable by natural processes and storage systems	0	No effect	0	No effect	0	No effect	0	No effect	0
1.3 Does the option avoid any deterioration of river water quality	0	No effect	0	No effect	0	No effect	0	No effect	0
SA OBJECTIVE: BIODIVERSITY									
2.1 Avoid damage to designated sites and protected species	0	No effect identified (see also HRA screening report)	0	No effect identified (see also HRA screening report)	0	No effect identified (see also HRA screening report)	0	No effect identified (see also HRA screening report)	0
2.2 Maintain and enhance the geographical range, amount and viability of habitats and species	+	Has the potential to enhance, if linkages can be made to local nature reserve in the area.	0	No known effect	0	No known effect	0	No known effect	0
SA OBJECTIVE: LANDSCAPE AND CULTURAL HERITAGE									
3.1 Preserve and where appropriate, enhance buildings, monuments, sites, areas and landscapes that are designated or locally	0	No known effect. A number of monuments are present across the north setting of the church located on Wisbech Road would	0	No known effect. A number of monuments are present across the eastern area.	0	No known effect. A number of monuments are present across the southern Knight's End Road in southwest March.	0	No known effect. A number of monuments are present across the western area.	0

valued for their heritage interest; and protect/enhance their settings.		require consideration. The route of a former Roman Road runs through March north of the centre.			Cluster of listed buildings located between Church Street and Wimbington Road.	
3.2 Create places, spaces and buildings that are well designed, contribute to a high quality public realm and maintain and enhance diversity and local distinctiveness of townscape character.	+	Subject to detailed masterplanning. The proximity of the railway station presents itself as an opportunity for growth to the north east although the railway line poses some severance issues	-	+	Subject to detailed masterplanning. Parts of this segment are close to the town centre and would provide a good fit with the town's character.	+
3.3 Retain the distinctive character of Fenland's landscape.	0	No known effect	0	0	No known effect	No known effect
SA OBJECTIVE: CLIMATE CHANGE AND FLOOD RISK						
4.1 Increase use of renewable energy sources whilst minimising waste and the use of other energy resources	0	Subject to detailed masterplanning. Although relatively low, heat requirements could support district heating. The area around north March is considered to have high capacity to small groups of wind turbines. Wind speeds are high enough to support large turbines.	0	0	Subject to detailed masterplanning. Although relatively low, heat requirements could support district heating. The area around east March is considered to have high capacity to small groups of wind turbines. Wind speeds are high enough to support large turbines.	0
4.2 Limit or reduce vulnerability to the effects of climate change	0	No known effect	0	0	No known effect	No known effect
4.3 Minimise vulnerability of people, places and property to the risk of flooding from all sources	/	Mixed picture, with some areas of flood zone 3 and other areas outside of flood risk	/	++	Large areas to the south away from flood risk	/
SA OBJECTIVE: POLLUTION						
5.1 Reduce emissions of greenhouse gasses and	0	No known significant effects	0	0	No known significant effects	No known significant effects

other pollutants (including air, water, soil, noise, vibration and light)									
5.2. Reduce the risk of pollution to the environment from contaminated land.	0	No known significant effects	0	No known significant effects	0	No known significant effects	0	No known significant effects	No known significant effects
SA OBJECTIVE: HEALTHY, INCLUSIVE AND ACCESSIBLE COMMUNITIES									
6.1 Improve the quality, range and accessibility of services and facilities (e.g. health, transport, education, training, leisure opportunities and community activities); and ensure all groups thrive in safe environments and decent, affordable homes	0	No known effect. Subject to detailed masterplanning.	0	No known effect. Subject to detailed masterplanning.	0	No known effect. Subject to detailed masterplanning.	0	No known effect. Subject to detailed masterplanning.	No known effect. Subject to detailed masterplanning.
6.2 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	0	No known effect. Subject to detailed masterplanning.	0	No known effect. Subject to detailed masterplanning.	0	No known effect. Subject to detailed masterplanning.	0	No known effect. Subject to detailed masterplanning.	No known effect. Subject to detailed masterplanning.
6.3 Redress inequalities related to age, gender, disability, race, faith, location and income	0	No known effect.	0	No known effect.	0	No known effect.	0	No known effect.	No known effect.
SA OBJECTIVE: ECONOMIC ACTIVITY									
7.1 Help people gain access to a range of employment and training	++	Whilst subject to detailed masterplanning, development in this location	+	Whilst subject to detailed masterplanning, development in this location would be	+	Whilst subject to detailed masterplanning, development in this location would be	+	Whilst subject to detailed masterplanning, development in this location would be	Whilst subject to detailed masterplanning, development in this location would be

opportunities	would be close to employment options	reasonably close to employment options	reasonably close to employment options	reasonably close to employment options	reasonably close to employment options
7.2 Support investment in people, places, communications and other infrastructure to improve the efficiency, competitiveness, vitality and adaptability of the local economy	0 No known effect.	0 No known effect.	0 No known effect.	0 No known effect.	0 No known effect.
* Including Assessment of the impact on the short, medium and long term effects (first 5 years, 5-10 years hence, beyond the lifetime of the plan)					
Conclusions:					
The potential for development in the south comes out most favourably, especially on the crucial matter of flood risk. Development elsewhere has limitations, especially as a result of flood risk. Conclusion: 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.					

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 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.

8. Appraisal and Evidence Base for the Determination of Strategic Allocations and Broad Locations for Growth

Introduction

- 8.1 This section of the report takes the conclusions of the previous section (i.e. broadly which segments of each market town perform best from a sustainability appraisal perspective), and sets out detailed evidence why Fenland District Council has allocated, either specifically or broadly, land for development in those appropriate segments.
- 8.2 This section also assess 'reasonable alternatives', even where such alternatives are broadly rejected in sections 4-7. It does this on a precautionary basis, as a 'belt-and-braces' exercise, to ensure no appropriate development sites are rejected.

Minimum qualification requirements to be 'allocated'

- 8.3 Fenland District Council determined from the outset to not have detailed allocations down to, say, 5 or 10 dwellings as per many traditional 'site allocations development plans'. This was for four prime reasons:
- The Council wanted a more flexible, criteria based plan which enabled development to come forward without rigid black and white boundaries of all development sites set out on a map. In the past, such rigid boundaries ('Development Area Boundaries' or DABs as they have been known in Fenland for the past 20 years) have proven unhelpful, especially in village locations where otherwise appropriate development on the edge of the village has been constrained by a rigid boundary.
 - The time and resources to prepare such a detailed plan, covering a large rural district and lots of settlements, would be a considerable burden on the Council and would cause lengthy delays to plan preparation, contrary to government aspirations.
 - The NPPF makes no requirement for such detailed site planning. Indeed, the opposite, with its emphasis that Local Plans should be 'strategic' in nature.
 - The Localism Act enables Neighbourhood Plans to come forward. Such Neighbourhood Plans would be a suitable vehicle for identifying (on a map) and bringing forward small to medium scale development sites, should the local community want to.
- 8.4 As such, the Council has the following criteria in order for a location to be allocated (whether specifically as a strategic allocation or as a broad location):
- For predominantly housing only locations, a site capable of delivering a minimum of 250 homes.
 - For mixed use locations, a site capable of delivering a minimum of 150 homes plus some other substantial land use such as employment.
 - For non-residential locations, a site capable of substantial new development, such as a large employment zone of major significance to at least the town in which it is located.
- 8.5 This section of the report seeks to identify all known constraints and opportunities for a particular area, including broad infrastructure requirements and developer interests, and sets out why it considers that particular site can be delivered during the plan period.

Justification for having 'strategic' and 'broad' locations for Growth: National Context

- 8.6 The National Planning Policy Framework – March 2012 (NPPF) advises in Paragraph 157 (bullet points 4 and 5) that: "*Crucially, Local Plans should:*
- *indicate broad locations for strategic development on a key diagram and land-use designations on a proposals map;*

- *allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate;*

8.7 Paragraph 17 of the NPPF sets out core planning principles and advises that

“Plans should... set out a clear strategy for allocating sufficient land which is suitable for development in their area...”

8.8 Paragraph 21 (bullet point 2) explains that to encourage economic growth the Local Planning Authority (LPA) should:

“set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period”

8.9 For new housing Paragraph 47 requires the LPA to *“identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements ...”* and, *“identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15”*

8.10 Finally, Paragraph 173 also makes it clear that *“Plans should be deliverable”*, whilst Paragraph 177 highlights that there should be: *“...a reasonable prospect that planned infrastructure is deliverable in a timely fashion... For this reason, infrastructure and development policies should be planned at the same time, in the Local Plan.”*

8.11 There is therefore consistent guidance in the NPPF that both strategic allocations and broad locations in the Local Plan have a crucial role to play in delivering growth, and that this should be planned at the same time as the necessary infrastructure.

8.12 In earlier versions of its emerging draft Core Strategy the Council identified sizeable areas of land for new development by indicating broad locations for growth, but not any strategic sites. Following publication of the NPPF, as well as listening to views through consultation exercises, the Council considers that a combination of broad locations (showing general areas for growth) and strategic allocations (with specific boundaries for growth) would be the best way to provide clear policies in the Local Plan to assist in certainty, clarity and to encourage large scale development, whilst at the same time being in accordance with the NPPF.

Methodology for determining allocations

8.13 In seeking to establish (a) where strategic allocations or (b) broad allocations could be identified, an iterative process was undertaken involving the consideration of known evidence, site visits, and desk-top analysis using GIS mapping. A wide range of factors were considered including:

- Whether isolated or adjacent to existing settlements
- Impact on landscape character and open countryside
- Impact on heritage assets
- Impact on designated nature sites and other known biodiversity
- Proximity to key services including town centres, local schools, local convenience shopping, and employment areas
- Impact on the morphology of the town
- Whether a Greenfield or Brownfield (previously developed land) site
- Whether agricultural land and grade affected
- Flood risk
- Land contamination

- Impact on waste and minerals issues including safeguarded areas
- Potential to provide road access(es) and opportunities to link to the existing footway and cycleway network
- Potential to improve lives of existing residents and create healthy and sustainable communities
- Potential to provide or utilise existing open space
- Likely infrastructure required to facilitate development
- Developer interest

Site Visits

8.14 Site visits were undertaken for all the candidate areas, to help clarify the process and to determine accurately issues such as:




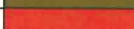

- Edge of existing built up parts of the settlement including the rear of dwellings
- Raised embankments e.g. for drains, roads or railways
- Drains, ditches and rivers
- Roads and farm tracks
- Mature hedgerows,
- Tree belts, woodland
- Curtilages of existing development
- Access required to serve the development

Formulating possible boundaries

- 8.15 Following the gathering of information, and after a site visit to each area, consideration was given to establishing appropriate boundaries. The basic principle was that if a firm boundary could be identified then it would be, and the allocated land would become a strategic allocation.
- 8.16 Some boundaries have been established using one or more of the criteria, though in some instances the need for further demarcation such as enhanced landscaping along boundaries has been highlighted.
- 8.17 Where a broad area has been identified as suitable for growth but that it has not been possible to establish finite boundaries at the present time (due, for example, the need to consider flood mitigation measures, transport implications, insufficient information regarding landowner and developer interest), these areas have been identified as broad locations for growth.

Assessing Constraints and Opportunities

- 8.18 Whilst the segment approach of Sections 4-7 established the principle that growth may come forward in at least part of a particular segment, a wide range of issues were used to confirm more precisely where it is most appropriate for that growth to come forward.
- 8.19 For each potential location a traffic light system was used for the majority of issues as set out below:

No known constraints	
Minor constraints - should be relatively easy to address, and/or utilise	
Medium constraints – should be possible to address	
Major constraints – detailed assessment required – proceed with caution	
Significant constraints – unable to overcome	

- 8.20 As shown above, five rather than the usual three colours (red, amber and green) were used in this analysis. This is considered to give a more flexible and accurate picture of whether a particular issue/constraint is one which can be overcome, needs further detailed consideration

and/or has potential to enhance the development. It allows for a more objective overall assessment to be made on an area based on all known factors to ensure that a comprehensive picture of the relevant issues emerges.

- 8.21 The above generic system was not appropriate for all issues being considered. Therefore, some additional bespoke systems were created, as follows.
- 8.22 For the proximity to key services the following assessment was used. Distances were measured from the nearest point of the area to the particular service; and for the town centre the distance to it closest edge.

Up to 300m	
Up to 600m	
Up to 900m	
Up to 1200m	
More than 1200m	

- 8.23 For the grade of agricultural land the following assessment was used:

Non-agricultural	
Grade 4	
Grade 3	
Grade 2	
Grade 1	

- 8.24 For the distance from designated nature sites the following assessment was used (though this element of the appraisal should be read alongside the Habitats Regulations Assessment work, available in a separate evidence report):

More than 15km away	
Between 10 – 15km away	
Between 5 - 10km away	
Between 1- 5km away	
Within 1km	

- 8.25 It should be noted that a number scoring system (i.e. one where each site scores points for each issue, and the one with most points 'wins' and is allocated) was avoided as it was considered that this can give disproportional weight to a particular issue.

Detailed Analysis of Areas

- 8.26 On the following pages, a detailed analysis of each of the locations identified in the Core Strategy is undertaken.