



Going for Growth Evidence Report

February 2013

'Going for Growth' Evidence Report

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1 Introduction and Context for Growth

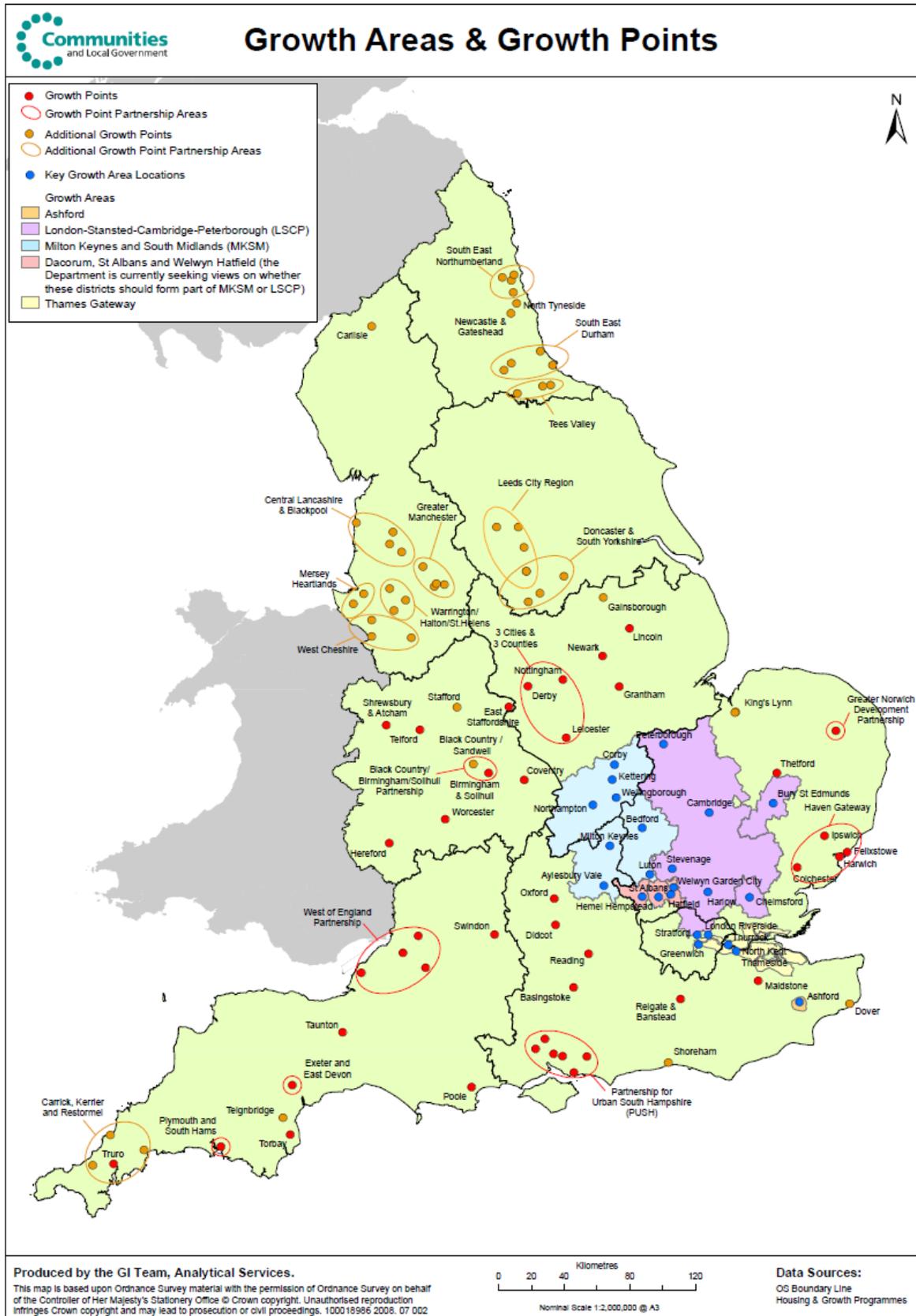
Introduction

- 1.1 Fenland District Council is producing the Fenland Core Strategy which sets out the framework for how development will be considered across the district to 2031.
- 1.2 This Evidence report (which is one of a collection) seeks to draw together a number of sources to demonstrate why Fenland District Council consider the most appropriate option is to 'go for growth' in its Core Strategy.
- 1.3 Please note that this evidence report does not discuss the details of such growth (such as housing targets and location of such housing) – these issues are dealt with in separate evidence reports and sustainability appraisal reports. This report is about demonstrating in principle that going for growth is appropriate.

National Context

- 1.4 For many years, national policy has placed Fenland in an area capable of growth. In February 2003 the Government's Sustainable Communities Plan was published, outlining a strong commitment to accommodate the economic success of London and the wider South East. As part of that Plan, four Growth Areas were identified for investment, one of which was the London-Stansted-Cambridge corridor. A year later, this Growth Area was expanded northwards up to and including Peterborough and thus firmly including Fenland in the renamed London-Stansted-Cambridge-Peterborough Growth Area (see map on next page).
- 1.5 These national growth areas do not have the same prominence as they had with the previous government (and no longer have funding aligned to them, such as the previous Growth Area Funding), but they do demonstrate the origins of 'going for growth' in Fenland.
- 1.6 Instead of these growth areas, the new Government has focussed its approach to growth on a broader national 'going for growth' position, rather than targeting particular areas.
- 1.7 This position was emphasised on 23 March 2011, when Greg Clarke (Minister for Decentralisation and Cities) issued a 'Planning for Growth' Statement. Appendix 1 has the full statement, but two particularly relevant points are:
 - *"The Government's top priority in reforming the planning system is to promote sustainable economic growth and jobs."*
 - *"Local planning authorities should therefore press ahead without delay in preparing up-to-date development plans, and should use that opportunity to be proactive in driving and supporting the growth that this country needs."*
- 1.8 More recently, the National Planning Policy Framework (NPPF) equally has a strong presumption in favour of growth, as the following points illustrate:
 - *"At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development"* (para 14)
 - *"Planning should...proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving places that the country needs"* (para 17)
 - *"The Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth"* (para 19)
 - *"Planning should operate to encourage and not act as an impediment to sustainable growth"* (para 19)
 - Local Planning Authorities should *"boost significantly the supply of housing"* (para 47)

Figure 1: CLG's Growth Areas and Growth Points



Source: CLG website 13.3.2012: <http://www.communities.gov.uk/documents/housing/pdf/898634.pdf>

Regional Context

- 1.9 The recently revoked East of England Plan, also known as the Regional Spatial Strategy for the East of England (RSS), set out the regional strategy for planning and development in the East of England. The RSS was unashamedly a 'growth strategy'. It includes growth targets for Fenland of approximately 11,000 new homes and an indicative target for net growth in jobs for the period 2001-2021 for Cambridgeshire (including Fenland) of 75,000 (see East of England Plan (2008) Policy E1).
- 1.10 Despite the recent revocation, the evidence behind the RSS does not disappear – it remains useful as evidence base which a council can legitimately use when setting local planning policy.
- 1.11 Fenland District Council supported the broad thrust of the RSS, including its broad growth ambitions and the targets it placed on Fenland. Nevertheless, in order to inform future development in Fenland and ensure the proposals in the Core Strategy are up-to-date and robust, the Council has undertaken a series of evidence studies to consider the most appropriate level of growth in the district to 2031, as is now briefly described.

Fenland Context

- 1.12 The Fenland Neighbourhood Planning Vision (FNPV) project – Stage 1¹ sets out in considerable detail the overall baseline in which Fenland finds itself today. As reported in the Executive Summary of that document, some key points to note, particularly from a spatial planning perspective, include:

- *“Fenland is a place where quality of life and opportunities for its residents are lower compared to its neighbours and to other similar rural districts.”*
- *“...the district has an opportunity to use growth as a catalyst for change, improving life chances by effecting a step change in the economic, social and environmental opportunities.”*
- *“Fenland is an area that has already seen significant population and economic growth over the past 10 years. However, without proper planning it is unlikely that this trend will continue.”*
- *“...growth has come about through an in-migration of older people.”*
- *“access to housing still a major issue for residents”*
- *“Fenland is blessed with tremendous potential. It has a good location offering proximity to dynamic neighbouring economies; high quality heritage and built assets of the market towns with the potential to drive growth across a range of sectors; an explicit commitment from stakeholders to excellence in partnership working, strategy and delivering growth; potential niche sector specialisms in food, logistics, advanced engineering and renewable sectors; and an ongoing investment in education and training through existing strategy and key projects such as BSF.”*
- *“However, these opportunities are being held back by major structural issues. Fenland has a narrow and relatively low economic base dominating by declining or slow growth sectors. This is compounded by a low wage occupational structure, along with lower than average incomes. Lack of skills is also a major issue, creating an uncompetitive skills base with too few people with entry level qualifications (NVQ2) and too few with higher level qualifications (NVQ4).”*
- *“[Fenland has] underperforming market towns and a lack of quality employment space, along with persistent pockets of deprivation and low economic participation.”*
- *“Fenland consistently achieves lower poorer results than the county and national averages at every stage [of the education system], and furthermore, the gap gets wider as young people move through the educational system.”*
- *“Fenland is an area of significant health inequalities, closely linked to wider deprivation indicators, with life expectancy, mortality and morbidity rate worse than its neighbours.”*

¹ <http://www.fenland.gov.uk/CHttpHandler.ashx?id=3503&p=0>

- *“Community cohesion is a priority across Fenland, with the district performing relatively badly against national indicators. ...Masterplanning key towns, to provide better design and mix of uses, along with town centre management strategies will need to come forward as growth in Fenland takes shape.”*
- *“Fenland’s natural environment contains a number of assets that need to be conserved and enhanced.”*
- *“Out-commuting and heavy reliance on the private car are key issues for the district.”*

2 Making the Case for Growth

National Case

- 2.1 It is not for Fenland District Council to defend or otherwise the national case for growth. However, as set out in the previous chapter of this evidence report, it is unequivocal that nationally there is a strong presumption in favour of a growth agenda and local councils should, through their Local Plans, facilitate such growth where appropriate.
- 2.2 Fenland District Council supports this national case. However, it also accepts that it needs to justify and make the case for growth at the local level.

Local Case for Growth: FNPV work

- 2.3 Stage 1 of the FNPV work, as summarised in the previous chapter, set the baseline conditions and issues in need of addressing as found in Fenland today. Stage 2 took the baseline work of stage 1, and made the case as to why 'growth' was the most appropriate option for Fenland to tackle those issues.

- 2.4 Chapter 4 of Stage 2 in particular set out the case for growth, concluding that growth "*will act as a catalyst for change across the district*" and that "*growth in itself will lead to change*" (para 4.20). It also concluded that:

- "*housing and employment growth will bring opportunities to build strong communities*" (para 4.21)
- "*new homes should provide the opportunity for in migration, bringing with it new skills*" (para 4.21)
- "*the district has a tremendous opportunity to exploit...natural resources for its economic and social benefits. Growth could have a clear role to play in this, potentially providing the basis for funding initial capital costs, or providing land or expertise to act as the catalyst.*" (para 4.23)
- "*growth can support healthier lifestyles through the provision of new or improved open space and better access to the countryside can be achieved through new development*" (para 4.26)"
- "*physical interventions...provide a good platform to further develop the offer of Fenland's secondary schools, to provide centres of excellence for both pupils and the wider economy, boosting skills over the medium to long-term and in doing so, making Fenland an attractive place for employers and employees alike.*" (para 4.27)
- "*improving connections will be vital to reducing inequalities...Reducing the need for out-commuting through a focus on employment and services within settlements will be important...*" (para 4.29)

- 2.5 Essentially, the FNPV work is suggesting that well planned growth should lead to, amongst other things, an influx of new skills, a younger and more economically active population, increased opportunities for better paid employment, more attractive and dynamic town centres and higher aspirations or expectations from providers. This should benefit the existing population, bringing with it an opportunity for better services, employment opportunities and improved housing.

- 2.6 However, making the 'case for growth' is not sufficient alone in order to 'go for growth'. It is necessary to assess whether Fenland is capable of accommodating such growth. Four issues are particularly relevant in this regard:

- (i) Objectively assessed need for housing and job growth
- (ii) land supply issues
- (iii) infrastructure constraints
- (iv) deliverability

2.7 Each of these points are addressed via separate Evidence Report and sustainability appraisal documents, and confirm that 'going for growth' is a realistic and reasonable proposal for Fenland Council to take.

3 Alternative options considered

- 3.1 The national and regional policy position firmly suggests that, as a matter of principle, Fenland should aim to 'go for growth'.
- 3.2 However, Fenland District Council has had the opportunity to consider alternative approaches, particular if to go for growth would, on balance, not be the most sustainable local option. These including the chosen option are set out below.

Low Growth

- 3.3 By 'low growth' it is meant having a target for housing and job growth which would, in effect, constrain supply. 'Nil growth' would not be a reasonable alternative (and has thus not been tested), because there are already a certain level of commitments (for example, 1,764 dwellings committed with planning permission or under construction as at 1 April 2011 as well as consents for other forms of development) and there is likely to always be a steady supply of windfall sites on small plots.
- 3.4 However, Fenland District Council could have set a vision for the Core Strategy which effectively meant that only low amounts of new development would be permitted, predominantly on small infill plots or small sites, with nil urban extensions and nil (or very few) greenfield permissions.
- 3.5 This would have some benefits such as reduced resource consumption, reduced need for new infrastructure and greater protection of greenfield sites (most of which is high grade agricultural land in productive use). However, it would fail to deliver the wide range of benefits which substantial growth would bring (as identified in the FNPV work) and would fail to tackle the underlying issues and problems which Fenland faces.
- 3.6 As such, not only would a low growth option be contrary to national and regional policy, it is the least favoured option locally.

Low-Medium Growth

- 3.7 This option would be above the low growth option, but not as pro sustainable growth as the preferred option. It would include all the existing commitments, an allowance for windfalls plus some release of land for urban extensions, albeit not to the scale envisaged in the proposed Core Strategy.
- 3.8 This option would be better than the low growth option, in that there would be more scope to use such limited growth to help address the issues identified. But Fenland District Council believes that this option would still constrain growth, including job growth, and the ability to regenerate its towns. It would also not be of sufficient quantity to enable the much needed provision of extra infrastructure, such as open space, to come forward.
- 3.9 As such, not only would this low-medium growth option be contrary to national and regional policy, it is also not a favoured option locally.

Very High Growth

- 3.10 This option would promote growth above and beyond that set out in the Core Strategy, In effect, it would be unconstrained growth.
- 3.11 Growth in the market towns would be more than currently proposed, though there are doubts as to whether such growth could be accommodated (especially in Wisbech and Whittlesey due to infrastructure constraints), or delivered. It appears highly unlikely that the market could sustain, over a 20 year period, such high growth. To promote growth which the market is unlikely to be able to deliver would not be a sound approach.

- 3.12 Promoting unrealistic high levels of growth would be unhelpful to infrastructure providers because of the difficulty they would have to plan their infrastructure upgrades. It could also lead to distorted growth across the district, contrary to the balanced growth across the area that the Council is seeking.
- 3.13 Unconstrained growth would almost certainly lead to rural areas seeing high levels of growth, beyond what would be sustainable and putting pressure on local infrastructure.
- 3.14 Very high growth could also potentially fail the Habitats Regulations Assessment, because unconstrained high growth could result in 'harm' to protected sites.
- 3.15 As such, very high growth would be contrary to regional policy, potentially be contrary to international policy and, as it could not be classed as 'sustainable growth', would also not align with the national pro sustainable growth position.
- 3.16 A very high (unconstrained) growth option has therefore been rejected.

Conclusion

- 3.17 For the four options considered (i.e. the proposed approach, plus the three alternative options described above), Fenland District Council believes that the proposed approach is realistic and sustainable, and will provide the additional benefits that the district requires to help tackle a range of social, economic and environmental issues.
- 3.18 Further commentary and appraisal on the issues raised in this report can be found in the Sustainability Appraisal Part 1.

4 Conclusion:

- 4.1 This Evidence Report demonstrates that Fenland District Council's desire, in principle, to 'go for growth' in its Core Strategy is an entirely reasonable and appropriate proposition.
- 4.2 Nationally there is a strong push for growth, with Fenland recognised as being an area capable of supporting such growth.
- 4.3 Evidence suggests that, in order to tackle the issues arising in Fenland, going for growth has the potential for significant local benefits.
- 4.4 Alternative low, low-medium or very high growth options are not considered, as a matter of principle, appropriate as they would be contrary to national and regional policy, either inappropriately constraining growth at one end of the scale or over providing growth, which would be unsustainable and undeliverable by the market, at the other end.
- 4.5 Overall, therefore, Fenland District Council is confident that it is sound in its judgement in preparing a Core Strategy with a solid growth agenda at its heart.

Appendix one: Planning for Growth Statement

Planning for Growth

Date of statement: 23 March 2011

The Minister of State for Decentralisation (Mr. Greg Clark):

The Chancellor of the Exchequer has today issued a call to action on growth, publishing an ambitious set of proposals to help rebuild Britain's economy. The planning system has a key role to play in this, by ensuring that the sustainable development needed to support economic growth is able to proceed as easily as possible. We will work quickly to reform the planning system to achieve this, but the Government recognises that many of these actions will take some months to deliver, and that there is a pressing need to ensure that the planning system does everything it can to help secure a swift return to economic growth. This statement therefore sets out the steps the Government expects local planning authorities to take with immediate effect.

The Government's top priority in reforming the planning system is to promote sustainable economic growth and jobs. Government's clear expectation is that the answer to development and growth should wherever possible be 'yes', except where this would compromise the key sustainable development principles set out in national planning policy.

The Chancellor has today set out further detail on our commitment to introduce a strong presumption in favour of sustainable development in the forthcoming National Planning Policy Framework, which will expect local planning authorities to plan positively for new development; to deal promptly and favourably with applications that comply with up-to-date plans and national planning policies; and wherever possible to approve applications where plans are absent, out of date, silent or indeterminate.

Local planning authorities should therefore press ahead without delay in preparing up-to-date development plans, and should use that opportunity to be proactive in driving and supporting the growth that this country needs. They should make every effort to identify and meet the housing, business and other development needs of their areas, and respond positively to wider opportunities for growth, taking full account of relevant economic signals such as land prices. Authorities should work together to ensure that needs and opportunities that extend beyond (or cannot be met within) their own boundaries are identified and accommodated in a sustainable way, such as housing market requirements that cover a number of areas, and the strategic infrastructure necessary to support growth.

When deciding whether to grant planning permission, local planning authorities should support enterprise and facilitate housing, economic and other forms of sustainable development. Where relevant - and consistent with their statutory obligations - they should therefore:

- (i) consider fully the importance of national planning policies aimed at fostering economic growth and employment, given the need to ensure a return to robust growth after the recent recession
- (ii) take into account the need to maintain a flexible and responsive supply of land for key sectors, including housing
- (iii) consider the range of likely economic, environmental and social benefits of proposals; including long term or indirect benefits such as increased consumer choice, more viable communities and more robust local economies (which may, where relevant, include matters such as job creation and business productivity)
- (iv) be sensitive to the fact that local economies are subject to change and so take a positive approach to development where new economic data suggest that prior assessments of needs are no longer up-to-date
- (v) ensure that they do not impose unnecessary burdens on development.

In determining planning applications, local planning authorities are obliged to have regard to all relevant considerations. They should ensure that they give appropriate weight to the need to support economic recovery, that applications that secure sustainable growth are treated favourably (consistent with policy in PPS4), and that they can give clear reasons for their decisions.

To further ensure that development can go ahead, all local authorities should reconsider, at developers'

request, existing section 106 agreements that currently render schemes unviable, and where possible modify those obligations to allow development to proceed; provided this continues to ensure that the development remains acceptable in planning terms.

The Secretary of State for Communities and Local Government will take the principles in this statement into account when determining applications that come before him for decision. In particular he will attach significant weight to the need to secure economic growth and employment.

Benefits to the economy should, where relevant, be an important consideration when other development-related consents are being determined, including heritage, environmental, energy and transport consents. The Secretary of State for Culture, Olympics, Media and Sport, the Secretary of State for the Environment, Food and Rural Affairs, the Secretary of State for Energy and Climate Change and the Secretary of State for Transport have consequently agreed that to the extent it accords with the relevant statutory provisions and national policies, decisions on these other consents should place particular weight on the potential economic benefits offered by an application. They will reflect this principle in relevant decisions that come before them and encourage their agencies and non departmental bodies to adopt the same approach for the consents for which those other bodies are directly responsible.

Source: CLG website 13.3.2012: <http://www.communities.gov.uk/statements/corporate/planningforgrowth>