

Our ref: 2491/OP

2 August 2013

Neighbourhood Strategy Team  
Fenland District Council  
Fenland Hall  
County Road  
March  
PE15 8NQ

Hope Chapel House  
Hope Chapel Hill  
Hotwells  
Bristol BS8 4ND  
United Kingdom  
Tel: + 44 (0)117 923 0455  
Fax: + 44 (0)117 925 3702  
enquiries@thelandmarkpractice.com  
[www.thelandmarkpractice.com](http://www.thelandmarkpractice.com)

by e-mail

Dear Sirs

**REPRESENTATION TO THE FENLAND DISTRICT COUNCIL  
PROPOSED SUBMISSION ADDENDUM CORE STRATEGY**

Further to the above, I hereby enclose a representation form on behalf of my client, **Richborough Estates Ltd.**

We trust you will find our representations useful.

In the meantime, please do not hesitate to contact me if you should have any questions or require further information or clarification.

With kind regards

Yours faithfully,



Owen Pike  
SENIOR PLANNER

Enc Representation Form

Cc K Parkinson, Director, Richborough Estates Ltd (email only)

**SUSTAINABILITY  
IN PRACTICE**

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Landscape Architecture  
Ecology  
Environmental Planning  
EIA

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Fenland District Council

FENLAND CORE STRATEGY  
DEVELOPMENT PLAN DOCUMENT  
(Proposed Submission Version)

Addendum relating to North-East March Allocation

Representation Form

Please return your completed form by one of the following methods:

**By post to:** Neighbourhood Strategy (Planning Policy) Team,  
Fenland District Council, Fenland Hall, County Road,  
March, Cambridgeshire, PE15 8NQ

**By e-mail to:** neighbourhoodstrategy@fenland.gov.uk

**Representations must be received by 5pm on Wednesday 7th August 2013**

Representations should relate only to the Addendum. This is not an opportunity to submit representations on the remainder of the Proposed Submission Version of the Core Strategy. Previous representations made on the Proposed Submission Version will be taken into account and forwarded to the Planning Inspectorate. It is therefore not necessary to repeat representations previously made.

**PART A: PERSONAL DETAILS**

Signature: OWEN PIKE

Date: 02/08/13

**1. Personal Details\***

**2. Agent's Details (if applicable)**

*\*If an agent is appointed, please complete only the Title, Name and Organisation boxes in the first column below, but complete the full contact details of the agent in the second column.*

*Please note that as this is a public consultation your details and comments will be available for others to see.*

Title	<input type="text"/>	<input type="text" value="Mr"/>
First Name	<input type="text"/>	<input type="text" value="Owen"/>
Last Name	<input type="text"/>	<input type="text" value="Pike"/>
Job Title (where relevant)	<input type="text"/>	<input type="text" value="Senior Planner"/>
Organisation (where relevant)	<input type="text" value="Richborough Estates Ltd"/>	<input type="text" value="The Landmark Practice"/>
Address Line 1	<input type="text" value="c/o The Landmark Practice"/>	<input type="text" value="Hope Chapel House"/>
Line 2	<input type="text"/>	<input type="text" value="Hope Chapel Hill"/>
Line 3	<input type="text"/>	<input type="text" value="Hotwells, Bristol"/>
Post Code	<input type="text"/>	<input type="text" value="BS8 4ND"/>
Telephone Number	<input type="text"/>	<input type="text" value="01179 230455"/>
E-mail Address	<input type="text"/>	<input type="text" value="owen.pike@thelandmarkpractice.com"/>

## PART B: REPRESENTATION

Please repeat your Name or Organisation:

The Landmark Practice on behalf of Richborough Estates Ltd

3. Did you submit representations on the Proposed Submission Version of the Core Strategy during the public consultation (28 <sup>th</sup> February – 10 <sup>th</sup> April 2013)?	Yes:	<b>X</b>
	No:	(please go to Q6)
	Don't know	(please go to Q6)

4. Did you submit a representation relating to the North-East March Allocation (in Policy CS9 – March)?	Yes:	
	No:	<b>X</b>

5. If you submitted representations on the North-East March Allocation, do you want the comments you make below to replace those previously made (in so far as they relate to the North-East March amendments)?	Yes:	
	No:	

6. Do you support the amendments to the Proposed Submission Version as set out in the Addendum relating to North-East March?	Yes:	
	No:	<b>X</b>

7. With the addition of the amendments in the Addendum do you consider that the Fenland Core Strategy is legally compliant?	Yes:	
	No:	

8. With the addition of the amendments in the Addendum do you consider that the Fenland Core Strategy is sound?	Yes:	
	No:	<b>X</b>

9. If you consider the Fenland Core Strategy with the addition of the amendments in the Addendum is **not sound**, please identify your reason(s) for this by ticking the appropriate box(es). Please see the Guidance Notes to help you decide.

In my opinion, the Core Strategy is not:

Positively prepared:       Justified:       Effective:       Consistent with national policy:

10. Please use the box below to set out your reasoning behind your response to Q7, Q8 and/or Q9.

The amendments fail to distinguish between the previously proposed North-east March Strategic Allocation (SA) and the retained South-west March Broad Location for Growth (BLFG). With regard to SAs, Core Strategy paragraph 4.2.1 confirms that “...their precise and specific boundary is identified, and can be found in detail on the Policies Map. These boundaries are fixed, and we would expect development proposals to come forward which align to them.” It goes on to state that BLFG “which, due to current **uncertainties over the precise location and scale of growth** in these locations, are indicative locations for growth rather than specific allocations. As such, **the actual development boundaries...are subject to determination at the comprehensive delivery scheme and planning application stages**, and are not identified on the Policies Map.

Policy CS7 requires that urban extensions to the main towns, whether SAs or BLFG, must be planned

through a comprehensive delivery scheme, such as a detailed masterplanning exercise.

We consider that adding 200 homes to the South-west March BLFG is inappropriate in advance of surveying and establishing its environmental and development capacity, which we would expect of any robust and comprehensive masterplanning exercise. In addition, increasing the windfall allowance for March would require an average of 30 homes per year coming forward on unallocated sites (up from an allowance of 17.5 homes per year). The effectiveness of this approach is questionable. This statement is supported by the Council's Housing Evidence Report (February 2013) which discusses the split between historic delivery on greenfield land and brownfield sites and identifies a limited supply of committed sites. Consequently paragraph 3.18 "...suggests a shift towards housing delivery relying on windfall developments rather than planned strategic sites."

For these reasons, the amendments are not effective and accordingly, the approach is not sound.

*Continue on extra sheets/expand box if necessary*

11. If you think that the Fenland Core Strategy (with Addendum) needs further changes, please set out what you consider the change(s) should be to make it legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

We consider it would be more effective, and therefore more appropriate, if the notional allocation of 450 homes of the North-west March was redistributed equally between each of the Market Towns and Other Areas.

To make amendment 2 effective, Policy CS9 should be amended such that the capacity for the South-west March BLFG should remain **"around 300 dwellings"**.

To make amendment 3 effective, the table under paragraph 7.3.12 should be amended as follows:

	Wisbech	March	Chatteris	Whittlesey	Other Areas	Total
Strategic Allocations	900	2,600	1,150	500	0	5,150
Broad Locations	1,150	<b><u>"300"</u></b>	100	0	0	<b><u>"1,550"</u></b>
Extant Planning Permissions	431	478	170	113	438	1,630
CS4 Part B Sites	<b><u>"555"</u></b>	<b><u>"440"</u></b>	<b><u>"235"</u></b>	<b><u>"445"</u></b>	<b><u>"790"</u></b>	<b><u>"2,465"</u></b>
Net Completions 11/12	54	22	34	34	65	209
Total	<b><u>"3,090"</u></b>	<b><u>"3,840"</u></b>	<b><u>"1,689"</u></b>	<b><u>"1,092"</u></b>	<b><u>"1,293"</u></b>	11,004

The housing trajectory should be revised in accordance with the above table to make amendment 4 effective.

*Continue on extra sheets/expand box if necessary*

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation. **After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

12. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the forthcoming public examination (or can it be considered by written representations)?

<b>NO</b> , I do not wish to participate at the oral examination:	<b>YES</b> , I wish to participate at the oral examination:	<b>X</b>
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13. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Richborough Estates Ltd has a controlling interest in 5.6 hectares of land at Doddington and significant experience in successfully promoting development land through the development plan process.

*Continue on extra sheets/expand box if necessary*

**Please note** that the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

**Please make sure you have signed and dated  
the front page of the form**



**Fenland District Council**

**FENLAND CORE STRATEGY  
DEVELOPMENT PLAN DOCUMENT  
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**Guidance Notes on completing the  
Representation Form**

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