

Hearing Statement – Matter 3 Policy CS4

Questions 1 & 3

1. Wisbech is the largest settlement in Fenland by population, with the greatest level of employment and economic activity, and the most varied retail offer. Equivalent areas of Commercial development land are proposed for Wisbech and March so it is anticipated that Wisbech will not lose this economic position. Conversely March has a lesser range of employment opportunities and greater out migration for travel to work being closer to the Cambridge Sub-area. Whilst taking into account the proposed expansion of Wisbech within the West Norfolk District, it makes no sense to propose a lower level of growth for Wisbech than March.
2. The amendment to the March allocations proposing 600 (rather than 350) of the dwellings be windfall puts into question whether the additional windfall numbers will be achieved. Points raised under Q6 below and in the statement on Matter 9 support this point.
3. Our submissions on Matter 2 are also relevant to this point.
4. Additionally (and see representations also on Matter 8 – Wisbech) the infrastructure requirements for parts of Wisbech to develop require a threshold of numbers for viability, given the community facility requirements, and the apparent constraint on numbers, particularly in West Wisbech, run a risk of that threshold level not being available, and hampering delivery of that infrastructure at an early stage in the plan period.
5. It is for this reason that we would wish to see the amount of development proposed for Wisbech increased, not by a reduction at March numbers but by the adoption of the targets as minimum levels, with the scope for increase at Wisbech, subject to masterplanning demonstrating how delivery is possible. Given the apparent willingness of the Council to exceed numbers if delivery is possible, it would be more consistent with this objective for a minimum target.
6. We consider the Plan unsound without this alteration, in that not reflecting the intention for the targets to be minimum levels, that is expressed in the commentary within the policies, means it is not positively prepared or effective.

Question 2

7. As noted in the Statement under Matter 2, Question 9, it is submitted that the Criteria for development in villages ought to be entirely contained within Policy CS12, and the other plan Policies refer to CS 12, rather than using in CS3 additional wording referring to “infilling” or “adjacent to” which is contradictory, and thus the Plan is not sound by reason of not being effective.

Question 4

8. The plan describes large scale housing proposals as 250 units or more. It appears illogical that a scheme of 225 units would not necessarily be directed to an allocation or area of broad growth whereas a proposal for 250 is. The Council have stressed they are adopting a criteria based approach (Policy CS7), and the boundaries of the broad areas of growth are not precisely defined under their proposals. It is thus questioned whether it is possible in some circumstances to say whether a proposal may be within or outside a broad area of

growth. It is submitted that a policy suggesting refusal outside a non – precisely defined area does not give the certainty required for the plan to be effective, nor is it in accordance with NPPF or CS1 or the presumption in favour these set out. Either the policy is criteria based which if satisfied should lead to approval, or if the intention is that growth is to be restricted to specific areas of allocation, which is not supported, these need to be defined more precisely.

Question 5

9. The planned growth of villages clearly is dependent on increasing the size of some settlements by 10% or more (see Statement relating to Matter 2 also)
10. The issue is whether the requirement for strong local support for cumulative growth exceeding 10% is logical or appropriate. The situation could arise that larger schemes for which there is not local support but which are submitted early, utilise 9.9% increase in size, but are not subject to this constraint, and then smaller later schemes that follow which are welcomed locally, have to satisfy this criteria. It will not as drafted allow local opposition to effectively oppose unwanted scheme if submitted before the threshold is reached.
11. For Growth villages it may be that higher levels of growth needed to achieve the 1203 target would be hampered by this requirement.
12. The Hearing statement submitted in relation to Matter 12 Q 4 inter-relates to this issue.

Question 6

13. It is considered that the expectation that 2265 units (approx 20% of proposed growth) will come from windfall schemes is unrealistic particularly in relation to March where this number was increased from 350 to 600 with the amendment to the plan in July 2013. The Core Strategy Amendment document acknowledges this target as optimistic, and states it could be from sites exceeding 250 units (Rationale 3, third paragraph), which is a statement contrary to other plan policies (CS4 Part B) (Q 4 above also refers)
14. Windfalls increase at times of high house values when redevelopment of alternative uses becomes more viable. The lack of a local plan review for 20 years has meant that a significant proportion of potential windfalls have already come forward – developers have had to rely upon them in the absence of new allocations. The view of the development industry locally is that any windfall will have to rely in the main on extensions to settlements, and to leave such a proportion to unplanned extensions runs the risk of inappropriate growth, or under-performance on this target or probably both.
15. Windfall growth makes planning for infrastructure more difficult.
16. It is submitted that the policy is unsound in that its high reliance upon windfall makes it not justified or effective.