



FDC/Matter 3

**FENLAND LOCAL PLAN CORE STRATEGY
DEVELOPMENT PLAN DOCUMENT**

EXAMINATION

FENLAND DISTRICT COUNCIL STATEMENT

MATTER 3: HOUSING GROWTH AND MEETING HOUSING NEED

Fenland District Council
Fenland Hall
County Road
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PE15 8NQ

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www.fenland.gov.uk

Fenland District Council Statement in response to Matter 3: Housing Growth and Meeting Housing Need

ISSUES and QUESTIONS

Q1. Is the distribution of housing between the various settlements justified particularly having regard to past completion rates in the towns?

Yes, it is.

There are four fundamental reasons for believing this to be the case, with the following matters assisting in reaching this conclusion:

- (i) Distribution compared with population
- (ii) Distribution compared with past completion
- (iii) Distribution to meet sustainable development principles
- (iv) Findings of the Sustainability Appraisal

Distribution compared with population:

The distribution of housing in the plan is in five broad categories, and the following table demonstrates how the distribution fits with the current population spread (Census 2011 based):

Location	Population	% split	Housing Target	% split
March	22,298	23%	4,200	38%
Wisbech	22,841	24%	3,000	27%
Chatteris	10,453	11%	1,600	15%
Whittlesey	13,000	14%	1,000	9%
'Elsewhere'	26,670	28%	1,200	11%
Fenland Total	95,262	100%	11,000	100%

This table demonstrates that a significant proportion of the population of Fenland (47%) is located in the Market towns of March and Wisbech. For Chatteris and Whittlesey the proportion of population represents a further 25%, leading to a total 72% of the population of Fenland living in the four market towns. Around 28% of the population in Fenland currently live outside the four market towns. The proposed housing growth does not exactly match this proportional distribution with a split of 89% in the four market towns, and 11% outside. This is discussed in further detail below.

Distribution compared with past completion:

Using the same five location categories, a similar table can be produced comparing past delivery with planned distribution:

Location	Completions (net) 2001-13	% split	Housing Target	% split
March	1,494	23%	4,200	38%
Wisbech	1,226	19%	3,000	27%
Chatteris	826	13%	1,600	15%
Whittlesey	434	7%	1,000	9%
'Elsewhere'	2,418	38%	1,200	11%
Fenland Total	6,398	100%	11,000	100%

This table demonstrates that a significant proportion of completions, almost 40%, have occurred outside the four main market towns. Of the towns, March has seen the highest proportion of completions at 23%, with Wisbech having marginally lower at 19%. Collectively the two smaller market towns of Chatteris and Whittlesey have seen about 20% of all completions since 2001. Again, in comparison, it is proposed that a much higher proportion of growth is located in the four main market towns. When reviewing completion data in Fenland it should be noted that the current Local Plan was adopted in 1993 meaning a large proportion of completions are on unallocated sites.

Distribution to meet sustainable development principles:

Whilst the above two principles are important to consider in assisting future distribution, more important is to establish a distribution which meets sustainable development principles and national and local policy.

There is widespread acknowledgement that growth should be focussed at locations which will facilitate sustainable living, in areas where there is good quality infrastructure or the ability to provide upgrades to such infrastructure. For many years, this has directed growth to our larger urban areas first. This focus on urban areas has applied in the Cambridgeshire area for many years, as the various joint statements and strategies confirm – see, for example, CD017.

As a matter of principle, therefore, FDC is correct to direct the majority of its growth to its urban areas.

However, and as the NPPF points out, this should not lead to a ‘zero growth’ policy for our rural areas (other than in the open countryside, where the NPPF points out that isolated new homes should be avoided unless needed for very specific reasons). As such, the Core Strategy does enable some limited growth to take place in the rural settlements, with an emphasis on the larger rural settlements where reasonable services and infrastructure can normally be found or secured.

In short, at just over 10% of all homes directed to the rural areas, FDC thinks it has the balance about right: sufficient growth to securing viable and thriving rural communities, yet not excessive growth which would otherwise lead to unsustainable growth, greater commuting levels and increased demand on service providers. And it must be remembered that rural areas have seen significant, disproportionate, amounts of growth in recent years; this trend must be reversed, aided by the first Local Plan for 20 years, and not repeated simply because that’s where growth has happened in the past.

Turning to the split between the four market towns, the emphasis here is focussing growth first on the two primary towns of March and Wisbech (where the greatest level of infrastructure and service provision can be found), with a bias towards March due to the lower constraints found in the town (on matters such as flood risk and highways, for example) and the greater access to sustainable transport means (Wisbech does not have a train station, for example).

The two remaining market towns are allocated a lower, but still significant level of growth. A significant determining factor in this regard, between the two, is the significant constraints that growth at Whittlesey has to overcome, namely flood risk / flood issues on the local highway network and the Nene Washes European protected habitat. These two factors in particular influenced the level of growth which FDC feels Whittlesey could deliver in a sustainable manner (whilst recognising the settlement’s close proximity to services and jobs at Peterborough).

Sustainability Appraisal

The Sustainability Appraisal report tested alternative distributions, and found the proposed approach the most appropriate.

Overall, therefore, FDC believes it has struck the right balance, based on evidence and policy, in respect of the distribution of growth across the district.

Q2. Policy CS3 clarifies that development in ‘Small Villages’ and ‘Other Villages’ will normally be limited in scale to ‘residential infilling’. Policy CS12 Part A (a) refers to sites being in or adjacent to the existing developed footprint. Is there any conflict of approach that would result in either policy being ineffective in its application to development in ‘Small Villages’ or ‘Other Villages’?

Agreed, there is the potential for conflict. FDC would therefore welcome the opportunity to modify the plan to prevent such conflict.

FDC’s intention for the plan is that as stated in CS3, namely that development in ‘small’ and ‘other’ villages should normally be limited to infilling opportunities. However, it is accepted that CS12 Part A(a) could appear to offer a wider scope for development in all villages, no matter their category in the hierarchy.

To ensure the intention as set out in CS3 is maintained in CS12, it is therefore proposed that a modification be made (Proposed Modification MPC/4/021) so that criteria (a) reads:

“The site is in or adjacent to the existing developed footprint* of the village (except for those villages listed in the settlement hierarchy in Policy CS3 as being ‘Small’ or ‘Other’ villages, where only infill sites will normally be considered favourably); and”

Policy CS4 Housing

Q3. Is the use of approximate targets (rather than minimum dwelling numbers) a sound approach? Is the Core Strategy positively prepared in relation to the provision of housing?

Yes, it is.

First, to set minimum figures suggests there is no ceiling. If that was the case, how can service and infrastructure providers plan for an unlimited level of growth? Such providers require reasonable certainty, something which ‘minimum’ figures would not achieve.

Second, minimum figures which are surpassed could lead to excessive and uncontrolled growth in this part of the county, contrary to the agreed sub-regional approach to focus growth at Cambridge and Peterborough. Sucking growth away, via unconstrained minimum growth targets, from the major urban areas into the more rural Fenland, would not only be unsustainable but lead to insufficient, sustainable and planned for growth in other locations.

Third, if the targets were ‘minimum’ then there would be a need for a full appropriate assessment to be prepared under the Habitats Regulations, and it is suggested that such an open ended growth target would fail such an assessment (especially considering the large number of European protected sites in or near to Fenland).

Fourth, a higher growth option (which a ‘minimum’ target is akin to) was tested in the sustainability appraisal, and did not come forward as the most sustainable option.

Fifth, the growth targets have been derived, and agreed across the housing market area, through a robust assessment process. Converting such agreed numbers to ‘minimum’ would undermine this essential component of plan making and NPPF guidance.

FDC is therefore of the firm view that having ‘minimum’ targets would lead to uncoordinated growth, unplanned pressure on infrastructure and services and potentially be unlawful under European regulations.

Nevertheless, FDC does not want to give the impression that such ‘good planning’ does not mean the district is not open to growth or the plan is not positively prepared; far from it. And if the market starts to strongly deliver sustainable growth in Fenland then the Council is very much committed to re-opening the plan and establish new growth targets – see paragraph 3.5.2 of the plan, for example. This is the right way to plan positively for growth; ‘minimum’ targets would be a flawed and unsustainable approach.

Q4. Policy CS4: Part B states that large scale housing proposals away from identified specific or broad locations for sustainable growth will be refused. Is this approach consistent with the NPPF and Policy CS1?

Yes, it is.

Without this qualification in the policy, and bearing in mind that the plan has been prepared with flexibility and strategic direction only (rather than detailed site boundaries for where growth can and cannot take place), large scale housing proposals (250+) could potentially come forward in an unplanned, uncoordinated manner, likely to breach growth targets for locations and cause significant uncertainty for infrastructure and service providers.

The NPPF is quite clear that the planning system is a plan-led system. Making it clear that large scale proposals which are contrary to the plan will be refused will ensure certainty and maintain a plan-led system in Fenland. Removing this element of the policy would be the complete opposite, and as such would be contrary to the NPPF.

Q5. Is the planned growth in villages (1203 dwellings) reliant on proposals that would increase the number of dwellings in the village by 10% or more and thus require evidence of strong local community support? If so, is the planned growth for ‘other locations’ realistic and deliverable?

In short, probably not.

CD033 demonstrates that, if each village in the settlement hierarchy grew by 10% from a 2011 base, then 898 dwellings would be provided. The report then acknowledges that not all villages will grow by a full 10%, so it could well be less than 898 dwellings. So on that basis, the answer to the question would be ‘yes, local support in some areas would be required in order to achieve the 1,203 target’.

However, there are two significant additional issues to consider.

First, it is highly likely that a significant number of dwellings will be built away from the villages in the open countryside, despite the generally restrictive policy to do so. In 2011/12, 20 were built in the open countryside, whilst a further 146 were completed in 2012/13 (though these figures are being investigated as we believe some, particularly in 12/13, were sites on the edge of settlements but outside the current settlement boundary, so technically

should not be classed as ‘elsewhere’. The County Council, as owner of the data, will be asked to explore this in due course).

Second, at least one settlement (Manea) has, by virtue of existing consents, already breached the 10% rule prior to the policy commencing and others are getting close.

Thus, on that basis it is quite probable that the ‘local support’ policy might not need to come into play.

But perhaps more important, is to ask the fundamental question ‘Does it matter if the local support policy has to come into play?’. FDC thinks not only is the policy robust, but entirely in line with localism and national policy. Is it not right that locals should have a say on how their village grows, if it is to grow by more than 10%?

And it should be pointed out that the policy does not insist on a neighbourhood plan being prepared (which would be an onerous requirement, if it did so). It simply requires proportionate efforts to be made to demonstrate local support. For a single dwelling in a larger village, that effort is likely only to require the consent of the majority of the local neighbours, whereas a 10 house scheme in a village of 100 would require a greater deal of evidence to be put forward (but, again, not necessarily a neighbourhood plan).

Q6. Is the expected delivery of 2265 dwellings through Policy CS4 – Part B (windfall development) sites realistic and justified?

Yes, it is.

This question comes to the heart of the plan. We are mindful of NPPF advice on the cautious use of windfall, but the Fenland Core Strategy is very strategic and flexible in nature and avoids strict development boundaries or allocating sites down to 5 or 10 units or so (as is common elsewhere). Thus, ‘windfall’ in Fenland is positively welcomed, and could be in settlements or on the edge of settlements, and could be as large as 249 homes in or on the edge of the four market towns (subject to the wider policies of the plan).

As such, the delivery of around 120 units per annum is entirely realistic and justified.