FDC/Matter 7

FENLAND LOCAL PLAN CORE STRATEGY DEVELOPMENT PLAN DOCUMENT

EXAMINATION

FENLAND DISTRICT COUNCIL STATEMENT

MATTER 7: URBAN EXTENSIONS
(Policy CS7)

Fenland District Council
Fenland Hall
County Road
March
PE15 8NQ

November 2013

www.fenland.gov.uk

Fenland District Council Statement in response to Matter 7: Urban Extensions (Policy CS7)

ISSUES and QUESTIONS

Q1. The development of urban extensions requires a comprehensive and coordinated approach. Are the anticipated timescales for delivery of these comprehensive schemes realistic?

Yes, FDC is confident they are.

A total of six strategic allocations and six broad locations for growth are identified in the Core Strategy. Of these twelve areas, only one is identified for above 1,000 units (or arguably two, if East Wisbech is combined with an as yet unconfirmed allocation in KLWNBC administrative area).

The largest site by far is at West March, indicatively for 2,000 units.

Thus, as a starting point, we need to be mindful that we are not dealing with sites of several thousand homes, such as Hampton in Peterborough, Alconbury in Huntingdonshire or Northstowe in S Cambridgeshire (all around 5,000 homes each or more). The urban extensions for Fenland are relatively modest, not only from a national perspective but from a local county perspective.

FDC accepts, nevertheless, that even such modest urban extensions can take some time to pull together, get permissions and build out. We believe we have reflected such in our detailed trajectories for each site (see CD025 – though please refer to the updated version of CD025, labelled 'CD025 v2 Nov13', which corrected some computing errors in the tables. We wrote to the Inspector highlighting this issue on 6th November 2013 and placed a revised version on the website on 7th November 2013).

As can be seen, we have only made an allowance for 210 homes to come forward on all strategic sites and broad location between now and April 2016, and then only expecting, at a peak, an annual rate of 540 homes to be delivered on those sites across all four towns combined. If anything, we are probably being conservative on delivery rates rather than optimistic…though being conservative does allow for slippage and unforeseen events to be catered for.

It is also worth noting that we are not at a standing start with all the sites, as the following demonstrates:

- Chatteris: S Chatteris Strategic Allocation has planning permission approved, subject to a s106, for up to 1,000 homes
- Whittlesey: East Whittlesey Strategic Allocation is, for most of its area, subject to an approved permission for approximately 460 homes
- March: West March, the biggest of the allocations, has been subject to informal discussion with officers, and an application is anticipated in the not too distant future.
- Wisbech: Nene Waterfront is a ready-serviced site, and we expect proposals to come forward for the site very soon.

To further assist progress on urban extension sites, and ensure the smooth running of them through the system, FDC Cabinet has also recently approved (October 2013) an informal guidance note entitled 'Facilitating Growth in Fenland Guidance' located at

http://www.fenland.gov.uk/CHttpHandler.ashx?id=8924&p=0 which we would be happy to add to the Core Documents Library.

Whilst FDC does, therefore, appreciate that larger sites do take time to coordinate, it is very confident that, over the next 18 years to 2031, there is no reason to doubt that the urban extensions cannot be delivered.

Q2. (a) Is Policy CS7 clear in terms of the requirements that proposals would need to satisfy?

Yes, FDC believes the policy is comprehensive and clear, and will ensure all parties understand the requirements for each urban extension.

(b) Is it sufficiently flexible to ensure that sites are not subject to a scale of obligations and policy burdens that their ability to be developed viably is threatened?

Yes, it is.

The key thrust of the policy is that a comprehensive approach must be taken, so a full and proper set of appropriate infrastructure and design considerations can be taken into account.

Through this comprehensive approach, a fair assessment can be made of viability issues, spread across all landowners (should there be more than one).

The criteria then set out what is required for each site, though they are carefully worded so as to enable flexibility. For example, phrases throughout the criteria include: 'contribute to', 'appropriate level of', 'if the scale of the urban extension justifies it', 'provide, commensurate with the scale of the urban extension', 'if a need is identified', and 'consider opportunities for'. These words give the appropriate flexibility required, open the door to discussion and negotiation, and should prevent viability to be threatened.

(c) Does this policy provide a clear indication of how a decision maker should react to a development proposal in accordance with paragraph 154 of the NPPF?

Yes, FDC believes it does. The policy is clear in terms of the 'headline' requirements for each scheme, but flexible to deal with the individual circumstances of each site.

It is intentionally strategic in nature, giving land owners the opportunity to create high quality urban extensions within a strategic framework of (decision maker) expectations.

Q3. Policy CS7 requires approval of a comprehensive scheme by the Planning Committee (if not through a SPD) prior to applications being considered favourably. Could this potentially introduce unnecessary delay in applications coming forward? Is Policy CS7 sufficiently flexible to enable a developer to submit a planning application for all or part of the site, when for example, it is accompanied by a comprehensive scheme albeit not previously approved by committee or a SPD?

Clearly, there is nothing to stop a developer from submitting a planning application for whatever purposes, for whatever area, whenever the developer sees fit. But what this policy is saying to developer is that, if you want to work with the Council and its partner authorities to achieve a successful scheme, in the shortest approval time possible, and with greater certainty and reducing risk/cost at each step of the way, then follow the process set out in

the policy. Come to the Council early, talk through the principles, and get the principles agreed through a comprehensive scheme.

If a developer wants to jump the gun and prepare both a comprehensive scheme and a detailed planning application at the same time, then there is a considerable risk that strategic matters will still need negotiation and amendments, which in turn means the detailed elements in the planning application would automatically need amending (at considerable cost and delay to the applicant).

Nevertheless, there is nothing in the policy to stop that process from taking place (i.e. it is flexible), should the developer want to take those risks. In all likelihood, a planning committee could, theoretically, consider and approve (or otherwise) the comprehensive scheme first, then deal with the planning application straight after, potentially at the same committee meeting. But this is not a process the Council would welcome or support.

Indeed, in reality, most quality developers now recognise the benefits of working with councils and local communities early, working up frameworks collectively prior to submitting detailed planning proposals. The Localism Act put in places mechanisms to make this happen. 'Surprise' applications, submitted to councils without prior discussion or community involvement, and with no pre-agreement on principles, tend to have a long history of delays, costs, and frustration and, quite often, a poor quality scheme at the end.

FDC thinks that the approach set out in the policy is not only sound, but one which benefits rather than hinders development coming forward.

In addition, to further assist developers and reiterate the Council's commitment to assisting developers, the Council adopted in October 2013 a Facilitating Growth in Fenland Guidance, as can be found at:
http://www.fenland.gov.uk/article/3244/Planning-General-Information