

REFERENCE NO: R147

## **Fenland Local Plan Core Strategy Submission Version September 2013 (FLPCSS)**

### **Statement on behalf of**

### **The Stevenson Family (and Larkfleet Homes)**

### **Land north of Eastrea Road, Whittlesey**

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This Statement is submitted on behalf of the Stevenson Family who own and farm the land edged red on the attached plan at Appendix 1 and Larkfleet Homes who have secured outline planning permission for a residential led mixed use development including approximately 460 market and affordable homes, a 70 bed nursing home, extra care facility and a local centre along with associated landscaping. ref; [F/YR12/0723/F](#). Reserved matters approval has been granted on phase 1 of this overall site for 120 homes access and landscaping. ref; [F/YR13/0473/RM](#).

This is on the adjacent land to the west known as "Whittlesey East" which is also identified on the plan at Appendix 1

#### **Spatial Strategy**

The Stevenson Family have supported, in principle **CS3**, of the the Spatial Strategy and in particular that element which identifies Whittlesey as one of the four market towns that have been identified as the focus of the majority of growth. This is in order to facilitate the health and wellbeing of fenlands residents and we agree that the majority of the district's new housing, employment, retail growth and wider service provision should take place within these settlements.

#### **MATTER 3 - Housing Growth and Meeting Housing Need**

##### **CS4 Housing – B – Criteria For Assessing Housing Development Proposal (Requested Change 1)**

They support the overall housing target identified in Policy **CS4**, but question the expressed concern over the section within the CS4 in relation to Wisbech that suggests there is some doubt as to whether the target of 3,000 dwellings is achievable to the extent that the Council have been explicit about the requirement to undertake a review, in part or whole, of the Core Strategy in the event that that target cannot be achieved following a master planning exercise.

The significant issues are identified as highways and flood risk and the explanatory text of the policy we would have anticipated that whilst "the Council has evidence to indicate that 3000 new homes are possible in Wisbech" these matters would have been analysed further prior to the designation of at least the strategic sites if there is some doubt over their delivery.

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The Core Strategy, as it stands at the moment, is not sound in the sense that it identifies that Wisbech may not achieve the target for new housing that is proposed and a redistribution of the housing allocation may be necessary.

The NPPF states that: -

*153. Each local planning authority should produce a Local Plan for its area. This can be reviewed in whole or in part to respond flexibly to changing circumstances. Any additional development plan documents should only be used where clearly justified. Supplementary planning documents should be used where they can help applicants make successful applications or aid infrastructure delivery, and should not be used to add unnecessarily to the financial burdens on development.*

Thus the NPPF acknowledges the need for review in light of changing circumstances but it is unusual for a strategy to identify at the outset that it may not be possible to deliver a major aspect of it. This suggests that the evidence base is inadequate and that the master-planning exercise should have already taken place.

The plan would be more robust if contingency sites were identified that could be utilised in the event that the proposals for Wisbech failed to deliver. The logical location for these in terms of sustainable development would be as extensions to the strategic sites identified within the strategy

As a result additional housing could be allocated to the three remaining market towns.

We therefore consider that it is not "sound" to adopt a Strategy where it is questionable as to whether the proposed distribution of housing is achievable. It is argued that monitoring makes it robust but if there is an inherent flaw that should have been addressed at the outset.

Thus that element of housing strategy relating to Wisbech is insufficiently robust and is therefore unsound.

If the plan is adopted and is found to be incapable of delivering the Wisbech housing target figure and it is accepted that redistribution must take place if overall district targets are to be met it would be better to have a contingency plan in place as part of the overall strategy rather than having to revisit the plan in part or as a whole at some point in the future.

In relation to this it is suggested that perhaps the targets for the remaining three market towns should include contingency proposals to accommodate more development should the need arise.

In that respect the Core Strategy would be more robust and sound.

This contingency could provide for the redistribution of numbers between the three remaining market towns perhaps based on an assumption that the 'contingency allocations' come forward for delivery at a later stage in the plan period if required.

The Core Strategy would be more robust if contingency sites were identified that could be utilised in the event that the proposals for Wisbech failed to deliver.

The logical location for these in terms of sustainable development would be as extensions to the Strategic Allocations and Broad Directions of Growth identified within the strategy.

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## Proposed Change

The Core Strategy at **CS4 A** - the paragraph relating to Wisbech should make reference to the potential extension to defined strategic allocations within the Market Towns of March, Chatteris and Whittlesey or specifically identify contingency sites as extensions to the existing strategic allocations and major committed sites.

## CS4 Housing – B – Criteria For Assessing Housing Development Proposal (Requested Change 2)

The need to accommodate large scale housing on the edge of the market towns in accordance with identified *Strategic Allocations* or *Broad Locations for Growth* are supported in principle.

In relation to Whittlesey change has occurred between the earlier consultations on the Core Strategy and the (FLPCSS) and the original "*Broad Direction of Growth*" has become more specific and land to the east of the market town is shown as a *strategic allocation*.

However, this does not correspond with the current planning situation which is that the sites are now commitments and that other commitments extend beyond the identified strategic allocations.

Thus there is already *a broad direction of sustainable growth* that extends beyond the strategic allocations identified on Whittlesey Key Diagram at page 53 of the FLPCSS.

It is also noted that other committed sites are not shown on the key diagrams. Therefore there is no consistency in the presentation of information. Sites which are allocations should be shown as allocations. Sites which are commitments should be shown as commitments.

Having regard to the overall housing target of 1,000 houses for Whittlesey (Policy CS4 Part A), whilst we argue that the strategic allocation is in fact a commitment and a further site allocation should be made, it would appear appropriate, as a minimum, to maintain the 'broad location for sustainable growth' to the east of Whittlesey in the event that the Wisbech housing numbers are not deliverable or in the event the balance of the housing allocation in Whittlesey cannot be met through windfall sites.

## Proposed Change

The Core Strategy at **CS4 A** – Table relating to housing numbers - add footnote.

*In the event that it becomes apparent that the housing delivery target numbers for Wisbech cannot be met and the shortfall is redistributed. The numbers will be distributed to the other market towns in locations that are consistent with the Broad Directions of Growth and Strategic Allocations identified on the individual market town key diagrams.*

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## MATTER 11

### Policy C11 – Whittlesey

Support is given to the development of land east of Whittlesey on the north and south of Eastrea Road. This however, should not be a strategic allocation as it was permitted well before the FLPCSS reached submission consultation and examination.

The strategic allocation as described provides for in the order of 500 new homes. The existing permission takes up the majority of these and much of the balance can be taken up on the southern side of the road.

Sites for the balance of 500 from the proposed target of 1000 have not been identified and may be difficult to accommodate given the physical constraints of the town particularly having regard to flood risk and delivery of housing in accordance with the overall policy objective of providing sustainable homes in sustainable locations.

The land shaded pink on the plan at Appendix 1 would represent a 'rounding off' of *this direction of sustainable growth* to the east area and could accommodate a significant proportion of the shortfall to be taken up within the plan period to 2031. It could also provide for development beyond this number threshold or timeframe.

This area, with Whittlesey East (the Larkfleet land, LPA Ref - F/YR12/0723/F), Sainsbury's, (LPA Ref - F/YR11/0930/F – resolution to approve) employment and the country park (LPA Ref – YR11/0895/O – resolution to approve) would represent a meaningful urban extension. That could, if developed on a comprehensive basis, help reduce and spread the cost of, what would be, substantial infrastructure works.

Additional land in the ownership of the Stevenson family outside the main site (edged pink) could also be considered as part of the mix particularly that adjacent to the Bassenhally Pits SSSI and the inclusion of this site would provide further opportunities to enhance the open space provision adjacent to the area and fully exploit foot and cycle links into the town.

The area of land between this possible 'urban extension' and Eastrea would then be maintained in perpetuity as a Green Wedge between the settlements of Whittlesey and Eastrea to stop the coalescence of those settlements.

Again it is to be highlighted that planning approval on the land south of Eastrea Road not forming part of the strategic allocation already has planning permission.

### Housing trajectory / delivery

Para 5.17 of the Housing Evidence Report November 2013 Indicates that *Whittlesey is one of the smaller market towns in Fenland. Completions from 2001 to 2013 have fluctuated between a high of 89 and 2007 /08 and a low of four in 2008 /9.*

It indicates in that paragraph *that*

*"this is largely a result of one or two large sites coming forward in a particular year.*

*This forward trajectory for Whittlesey assumes a continued trend of around **50 to 70** dwellings over the course of the plan period. As above, the first five years consist mainly of existing commitments. Beyond this period the site to the east is expected to deliver most of the housing, within CS4-part B allowance covering those smaller sites that have not formally been identified.*

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The NPPF indicates that: -

*48. Local planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens.*

There is no evidence that such sites have consistently come forward in recent years upon which to base this assumption.

This does not account that the strategic allocations are commitments and the first phase of housing is taking place early 2014.

Larkfleet anticipate that their build out rate on committed land will be **40 -80 units** a year alone which will mean that the 460 house development will be complete between 2020 and 2026.

If other commitments and smaller, yet to be identified sites, deliver houses during this period that will mean that the land supply will be taken up more quickly than the plan envisages.

It is anticipated that the pace of completions will be greater than the previous peaks identified in the Housing Evidence Report as a result of suppressed demand, a more positive economic outlook and initiatives to assist house purchase particularly amongst first time buyers. Also from a developers perspective Whittlesey is considered to be attractive as it will offer a competitive price edge over new development in Peterborough.

Essentially Whittlesey land supply identified in the FLPCSS policy will be taken up well before the end of the plan period **i.e. 2031** and a rolling five year supply is unlikely to be maintained beyond the plan mid-point. This gap arguably renders the plan unsound.

It therefore would therefore be prudent to: -

- make the existing strategic allocation a commitment and
- identify additional land on the attached plan as a strategic allocation or,
- as a minimum indicate it to be a direction for future sustainable growth.

## Conclusion

There are a number of considerations to be accounted that suggest that there would be benefit in providing a clearer direction for strategic growth (beyond the land identified for 500 houses ) in Whittlesey by identifying land that on which further housing could be delivered within the plan period. This could also act as a contingency in the event the housing delivery targets cannot be met in Wisbech.

Combined with the adjacent committed sites the inclusion of the (pink) Bassenhally land represents an eminently sustainable solution to future long term growth. It offers benefits for a number of reasons: -

- It is a logical extension to the Whittlesey East (Larkfleet) site.
- Beyond the phase one Whittlesey East development the Bassenhally land

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can physically be linked with Whittlesey East by footpaths, cycleways and roads. This connectivity would give convenient access to the facilities within that site.

- Linking with Whittlesey East would potentially give a critical mass to the eastern development that could allow the delivery of a wider range of facilities and services to existing and future residents.
- It will be very convenient access to the major shopping facility, employment opportunity and leisure offer that is to be developed directly opposite on the south side of Eastrea Road on foot and by cycle.
- All of the above will mean that with these committed facilities on their doorstep the propensity to use the private motor car to travel further afield will be reduced.
- The integrated development proposed should enable cost effective solutions to infrastructure provision by introducing economies of scale.
- The integrated development proposed should enable cost effective solutions to sustainable travel by supporting public transport provision through increasing passenger numbers on a main route to the town centre.
- Sufficient land will be available within one ownership and with Larkfleet (Lark Energy) a recognised developer to the forefront of emerging technologies to enable greater consideration to be given to more innovative energy solutions and allow master planning on a wider scale.

## **Proposed Changes**

### **Nomenclature**

Whittlesey Strategic Allocation.

The Core Strategy is not up to date as it does not reflect the current planning status of land at Whittlesey.

The proposed strategic allocation to the east of Whittlesey should be deleted and the corresponding area redefined as a commitment within the text of the Core Strategy.

### **Key Diagram for Whittlesey**

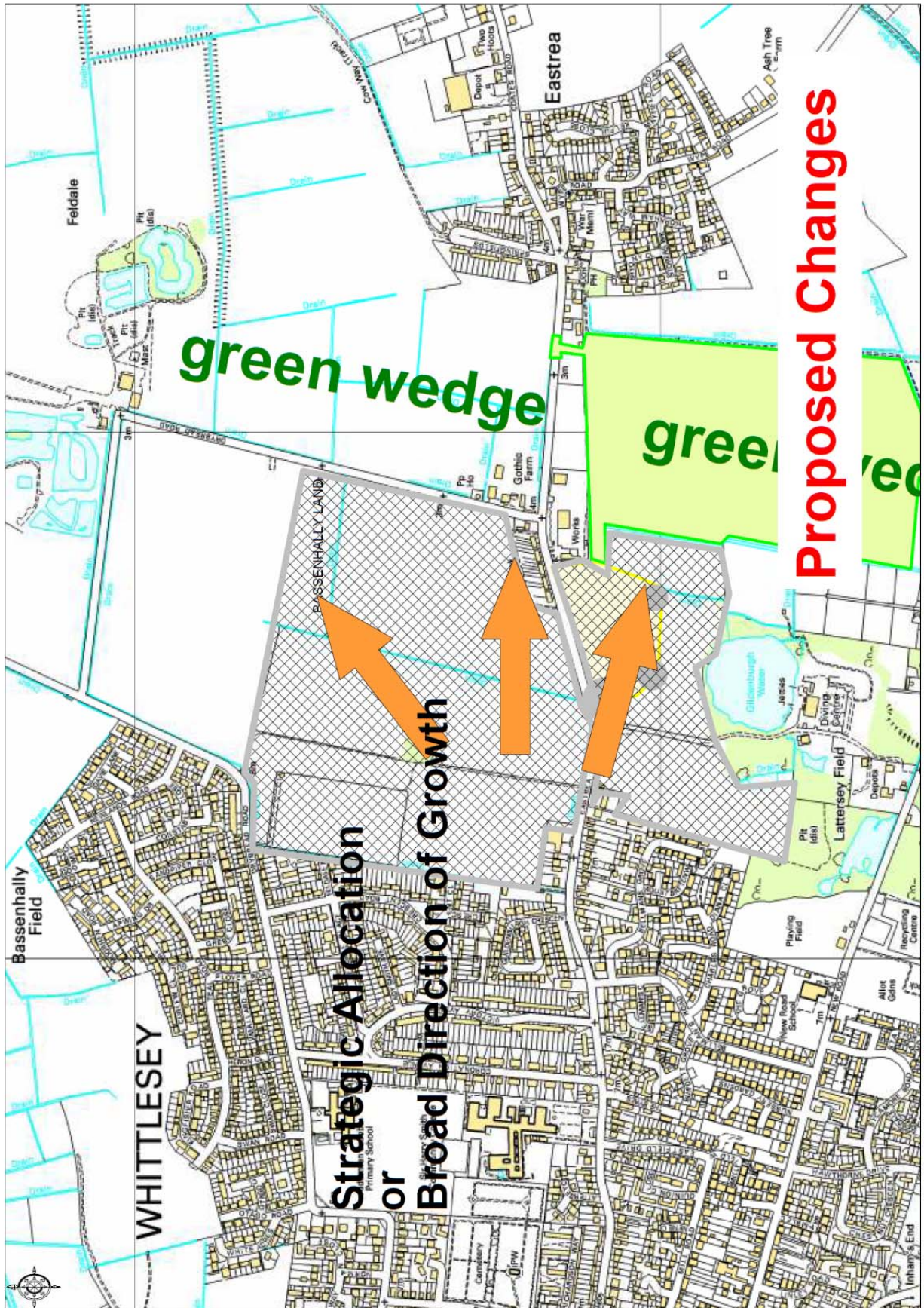
It is proposed that

1. the Key Diagram be amended to include the Larkfleet, nursery and Sainsbury's sites as *commitments* thus extending the notation showing the area to be developed further to the east on the south side of Eastrea Road beyond that area currently shown.
2. the Bassenhally Land to the east of the Whittlesey East (the Larkfleet land) be included as a strategic allocation to provide additional land for housing and associated mixed uses.
3. As an alternative the Bassenhally Land to the east of the Whittlesey East (the Larkfleet land) be included as a "Broad Location for Growth"
4. That consequential changes are made to the supporting text.



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5. Insert Green Wedge notation between Whittlesey and Eastrea.



Barker Storey Matthews

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## Final Comment

The land on the north side of Eastrea Road - the Larkfleet land is a commitment and is due to start on site in the first quarter of 2014.

That land on the south side of Eastrea Road running east parallel to the Larkfleet Land, and beyond the representation site including that on which residential development has previously been approved, and land upon which has planning permission has been granted for the development of a mixed use scheme including a Sainsbury's superstore, employment and leisure development (Country Park) is commitment and not a Strategic Allocation.

With the approvals the direction of growth for Whittlesey has been set to the east. This was envisaged in previous consultation documents.

The representation site is in the direction of growth and should be covered by a "Broad Direction of Growth" notation or as a Strategic Allocation to be taken up within the plan period to create and round off the sustainable urban extension and provide a robust and sound basis for the future development of the market town.

The Stevenson family and Larkfleet consider that aspects of the plan, particularly in relation to Whittlesey, are not sound but that the proposed changes highlighted will remedy these.



**JOHN S DADGE Dip TP MRTPI**  
***BARKER STOREY MATTHEWS***







# FENLAND SUBMISSION CORE STRATEGY - STATEMENT

## Larkfleet Master Plan Phase 1 edged red. **Appendix 2**

### ILLUSTRATIVE MASTERPLAN

### WHITTLESEY EAST Cambridgeshire



NORTH

SCALE: 1:1250 @ A1

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## Proposed masterplan Key

- |                        |                                  |   |
|------------------------|----------------------------------|---|
| 1 Community uses       | 6 Shuttle bus stop               | 11 Trees  |
| 2 Petrol station       | 7 Offices or research facilities | 12 Bridle way   |
| 3 New roundabout       | 8 Country park car park          | 13 Light industrial uses  |
| 4 Sainsbury's car park | 9 Open areas                     | 14 Financial/professional services, cafes/restaurant, take away |
| 5 Sainsbury's store    | 10 Community orchard             |   |

### MATTER 11 Policy C11 – Whittlesey

Master Plan for mixed use development including Sainsbury's, Employment and Country Park south of Stevenson's land.