# Hearing Statement – Matter 8 - Policy CS8 Wisbech

## Question 1

- All proposed allocations and broad areas of growth are subject to additional master
  planning. As such Wisbech does not differ from this overall approach. The subsequent work
  on Highways (Statement of Common Ground between FDC, CCC and BCKLWN CD013)
  acknowledges that whilst development related mitigation measures are required, there are
  no fundamental issues from a transport perspective related to the proposed levels of
  growth
- 2. Similarly from the work both FDC and the EA have done, ie the Wisbech level 2 FRA, and that done by land owners to the west of Wisbech, there are significant areas to the west that are not affected by flood to an extent that development is prevented, any more than the Nene Waterfront scheme, which is entirely within Zone 3, is prevented. Appropriate management of flood risk is required and can be incorporated in the master planning documentation. Recent improvement in flood defences in Wisbech have helped reduce this risk, and very little land to the west of Harecroft Road was flooded in the 1978 flood event when defences were significantly lower.
- 3. The risks in delivery of the target numbers are firstly that Nene Waterfront is unlikely to contribute the anticipated level, given changes in the market currently make significant parts of the proposal unviable, particularly the flats. Whilst some development on the scheme now seems imminent, the prospect of it delivering a total of 300 units is considered remote. The plan is unsound in not being justified on this point.
- 4. The second risk is the viability issues, given the current policy requirements for affordable housing and the need for infrastructure for the majority of schemes in the town. This risk could be reduced by an indication that the target numbers, particularly to the west, are a minimum and that higher numbers will be permitted, to spread the cost of the required infrastructure, provided master-planning demonstrates how they can be achieved.

## Question 2

5. In the light of the Statement of Common Ground on Highway issues (CD013), it is submitted that the emphasis on shift of transport measures incorporated in the policy now overstates the position and is thus unnecessary. It can be replaced by the mitigation measures referred to in this document.

## **Question 3**

6. Whilst South West Wisbech is undoubtedly a logical location for additional commercial allocation, most past commercial development in Wisbech has required outside funding for the infrastructure, mostly undertaken by FDC using European 5B funds. Some cross subsidy from the limited residential development at the eastern end of this section may be possible, but residual values of land may be too low to encourage delivery early in the plan period. Nevertheless costs of this location are unlikely to be higher than any alternative and the proposed allocation is supported.

## **Question 4**

- 1. The proposed West of Wisbech scheme is only reflected in part within the suggested Broad Areas of Growth. Appendix A contains a diagramatic plan indicating the scope of the overall scheme.
- 2. The scale of the scheme is such that its entirety is likely to span more than one plan period. Whilst an initial allocation is welcomed, regard has to be had at the master planning stage to the balance between delivery of community benefits, not least the provision of highway infrastructure likely to reduce congestion in other parts of the town, and the costs associated with this, and the feasibility and timing of the delivery of such benefits. This feasibility is reflected in the acknowledgement within CS8 that part funding may be forthcoming from other development and outside sources, as well as potentially relaxing affordable housing levels. However the restriction of scale to around 750 dwellings when a much greater number could be achieved within the growth area, which extends further than is shown by the diagramatic map within the CD013 document, also limits the potential revenues to contribute to community benefits. Our comments on question 1 above refer. It has been submitted in relation to Matter 3 elsewhere that the identification of scale as a minimum level, to be exceeded if demonstrated achievable by master-planning, would assist.
- 3. Designation of Leverington (as submitted under Matter 2) as a Growth Village would give additional scope for development linked with this overall provision.
- 4. It is highly likely that such a scheme will be delivered in phases, and we refer to our comments under Matter 7 in this respect. It is highly unlikely that the whole of a road link between Cromwell Road in the south and the A1101 in the north can be achieved on the basis of the scale of development that can be envisaged in this first plan period. What can be achieved can be maximised by flexibility in the numbers permitted, and a clear intention recorded in the plan that this area forms the location for long term growth of the town, beyond the plan period, giving those financially involved the confidence to commit to the level of investment required. It is possible to achieve a commencement of a route that, as the whole scheme is built out, becomes a Western Relief Road for the town, with an initial section between Cromwell Road and Barton Road, linked with the proposals, that ensure that some traffic relief is provided by a third river crossing initially, with traffic from the development not adding to existing congestion, and the scope for a major infrastructure improvement going forward. Our proposal that the number of 750 for this area is a minimum level, with scope for increase to 1500 based upon master-planning of West of Wisbech, would achieve this. The plan is not considered justified or effective with the current limitation to 750 for this area.