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Representation to Core Strategy Examination on behalf of Life Crown by:

David William Bridgwood
BA (Hons) Town Planning MSc Chartered Town Planner – Technical Director,
Wardell Armstrong LLP

November 2013

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DATE ISSUED: **November 2013**

JOB NUMBER: **ST11934**

REPORT NUMBER: **RPT-001**

Representation to Core Strategy Examination on behalf of Life Crown by:

David William Bridgwood

BA (Hons) Town Planning MSc Chartered Town Planner – Technical Director, Wardell Armstrong LLP

November 2013

1 INTRODUCTION

1.1 My name is David Bridgwood and I am a Technical Director of Wardell Armstrong LLP, a multi-disciplinary engineering, environmental and planning consultancy. I represent Lifecrown Investments Ltd who are, amongst other things, the parent company of Fenmarc Produce Ltd, the operators of a vegetable packing plant in March. My clients own an area of land shown on Plan ST11934-001, attached, which we have been promoting for mixed-use development on their behalf since 2008 and which is referred to by the Council as March North West. Attached, for reference purposes, are copies of the representations made on our client's behalf. These consist of:

1) Letter of Representation on Fenland Core Strategy October 2008
2) LDF Representation September 2011
3) LDF Representation September 2012
4) Proposed Submission Consultation Representation April 2013
5) North-East March Allocation Reconsultation Representation August 2013

1.2 I do not propose to repeat the matters already covered as these points are already before the Inspector, save to point out that my clients have the opportunity to bring forward a highly sustainable form of development. Whilst the Council may have initially been uncertain of their ability to deliver the AD plant which forms the key element of the development proposed, my clients have at every stage delivered on what they undertook to do. The AD plant is now fully operational.

2 MATTERS AND ISSUES FOR EXAMINATION

2.1 Matter 1, Q4

2.1.1 The case put forward on behalf of our clients has been consistent and based upon fundamental considerations of sustainable development. NPPF paragraph 6 is explicit that the purpose of the planning system is to achieve sustainable development. It is clear that the sustainability benefits of our proposals have not been properly taken into account. Our clients are proposing a highly sustainable form of development. None of the housing sites in March favoured by the Council offer a comparable opportunity for long term low-carbon development. It is clear therefore that the March North West site should have been included as an option for

development. To not allocate the site does not properly take account of the NPPF's requirement for sustainable development. This can be remedied by the allocation of the site.

2.2 **Matter 2, Q1**

2.2.1 The proposal for the Fenland area of 11,000 dwellings has not increased since the Structure Plan, despite the obvious increase in need for new houses within Fenland as a result of demographic change. The level of housing would therefore seem to underestimate the level of housing required. However, it would seem that this area has been one where the neighbouring Councils have embraced the duty to cooperate, which is positive. Under those circumstances, where the provision being made for dwellings is a known and strategic approach, it is important to make clear that within the sub-areas of Fenland the housing numbers are to be treated as minima, rather than maxima.

2.3 **Matter 2, Q2**

2.3.1 Whilst it appears that sites are likely to become available in Peterborough, there is no guarantee that the level of cross-boundary delivery relied upon for this approach to succeed will be delivered. It is appropriate therefore for the policy to make clear that in the event of under-delivery within Peterborough, additional housing units will be required within Fenland, either through a partial review or positive approach to the release of new sites.

2.4 **Matter 2, Q3**

2.4.1 The reality is that whilst the Council can make allocations of land, it is ultimately the market and the strength of the wider economy that will create jobs. However, this is not the end of the story. Within the Core Strategy allocations have been included for the development of employment. However, few of these sites are actually new allocations. Most of the sites are existing sites which are being retained / protected for future commercial development. It is not clear how attractive these sites are likely to be for future development. At the same time the March NW site put forward by my clients has not been included within the available sites, despite the obvious benefits of the inclusion of such mixed-use sites.

2.4.2 The cost of energy is of growing concern to many businesses, especially those with a high demand for energy. The available heat on the site could be used by a wide range of businesses from traditional food manufacturing typical of the fens right through to high technology small carbon fibre prototyping, and a very wide range of businesses in between. The availability of low carbon energy on a competitive tariff represents a unique selling point not available on any of the existing employment allocations presented by the Council. If Fenland is to deliver the employment needed then there will need to be an imaginative approach taken to the delivery of appropriate employment opportunities.

2.5 Matter 3, Q3

2.5.1 There is a direct linkage between the target set, knowingly for under-delivery within Fenland, and the use of approximate targets and minima. In circumstances where a conscious decision has been taken to deliver housing numbers at below the anticipated need, which is the case here, it is essential that the delivery number selected is achieved. In this instance insufficient sites have been identified in March to secure the anticipated trajectory as indicated in response to Q4 below. Consequently the ability to deliver additional dwellings and take advantage of sustainable forms of development is essential. Under those circumstances it is more appropriate to express the target as minima.

2.6 Matter 3 Q4

2.6.1 In the specific case of March, the sources upon which delivery relies are set out in the trajectory figure in paragraph 7.3.12 at 4,200 units. For ease of reference the table is reproduced below.

	Wisbech	March	Chatteris	Whittlesey	Other Areas	Total
Strategic Allocations	900	2,600	1,150	500	0	**5,150**
Broad Locations	1,150	500	100	0	0	**1,750**
Extant Planning Permissions	431	478	170	113	438	**1,630**
CS4 Part B Sites	465	600	145	355	700	**2,265**
Net Completions 11/12	54	22	34	34	65	**209**
Total	**3,000**	**4,200**	**1,599**	**1,002**	**1,203**	**11,004**

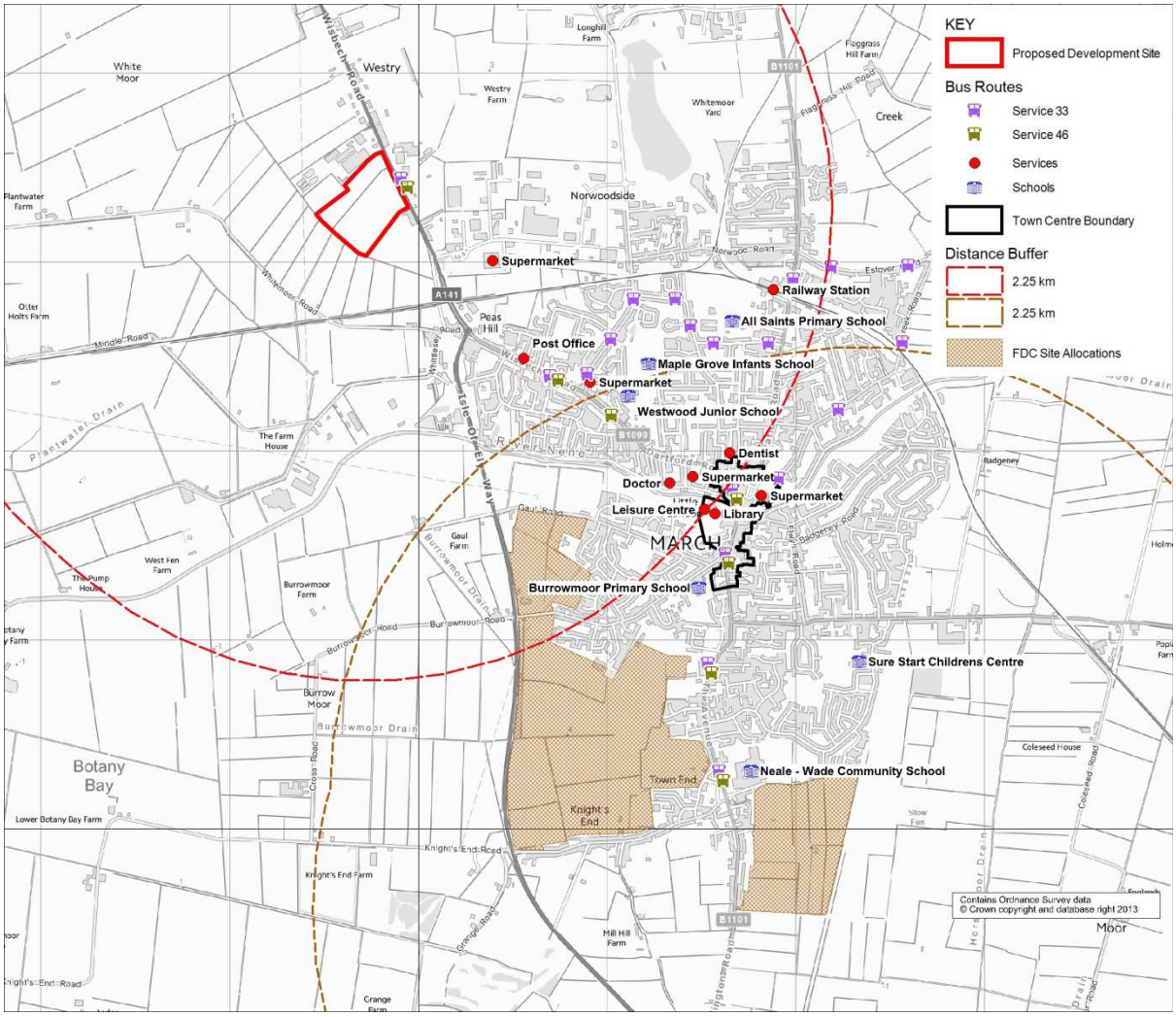
2.6.2 Significant reliance is placed upon the delivery of CS4 Part B sites and smaller allocation sites, despite the fact that many of these sites have been available for some time, yet failed to be brought forward even at the peak of the residential property market. The approach proposed makes no allowance for considering the sustainability of individual sites that fall outside those already identified; this is contrary to NPPF which identifies sustainable development as the key goal of the planning system. That restriction should therefore be removed from policy CS4. The test of sustainability set out in NPPF would then be employed to assess the individual sites.

2.7 **Matter 9, Q1a**

2.7.1 As indicated previously, there is a shortfall in the strategic housing allocation for March. Too high a reliance has therefore been placed on the ability of windfall sites to plug the gap, particularly when the effect of CS4, as currently written, is taken into account. In assessing the sites put forward, it is far from clear that the most sustainable sites have been selected for development. By concentrating solely on a very narrow set of locational characteristics, other sustainability factors have not been taken into account.

2.8 **Matter 9, Q1b**

2.8.1 The significant sustainability benefits of my client's site are set out in the representation of April 2013, and I do not propose to repeat those here. However, in terms of the specific locational characteristics of the site, we have prepared an illustration of the relative location of the site compared to the Council's preferred strategic allocation at South East March. This has been based upon a 2.25km walking distance, which in light of the flat conditions is considered to be an appropriate distance.



2.8.2 It can be seen that in locational terms the March NW site performs as well as the strategic allocation, yet offers significant sustainability benefits.

2.8.3 **Agricultural Land Quality**: In order to address the issues raised by the Council in terms of site selection, an additional report has been commissioned by my clients from a specialist agricultural consultant, a copy of which is attached. The previous ALC had been based on a very broad brush assessment taken from published MAFF data. The detailed report now undertaken confirms that the agricultural classification of the site is split between 3a (56%) with the remainder being either 3b or not agricultural. This is somewhat different to the assumption made by the Council in discounting the site on agricultural land quality. It can be seen that the loss of best and most versatile agricultural land is considerably less significant than in the sites selected as acceptable for development by the Council.

2.8.4 For the reasons already set out within the previous consultation responses the site is considerably more sustainable than any of the Council's preferred sites. Regrettably, this does not appear to have been properly considered by the Council and therefore the sustainability of the site selection process has not been properly undertaken in accordance with the clear prioritisation of sustainability set out within the NPPF.

2.9 **Matter 9, Q2**

2.9.1 The availability of sewage treatment capacity in March is an important consideration. However, that lack of capacity will have an impact on development anywhere within March. Utility companies have statutory duties to deal with such matters, and indeed the additional housing proposed in March will provide an additional long term revenue stream capable of delivering additional investment in sewage treatment.

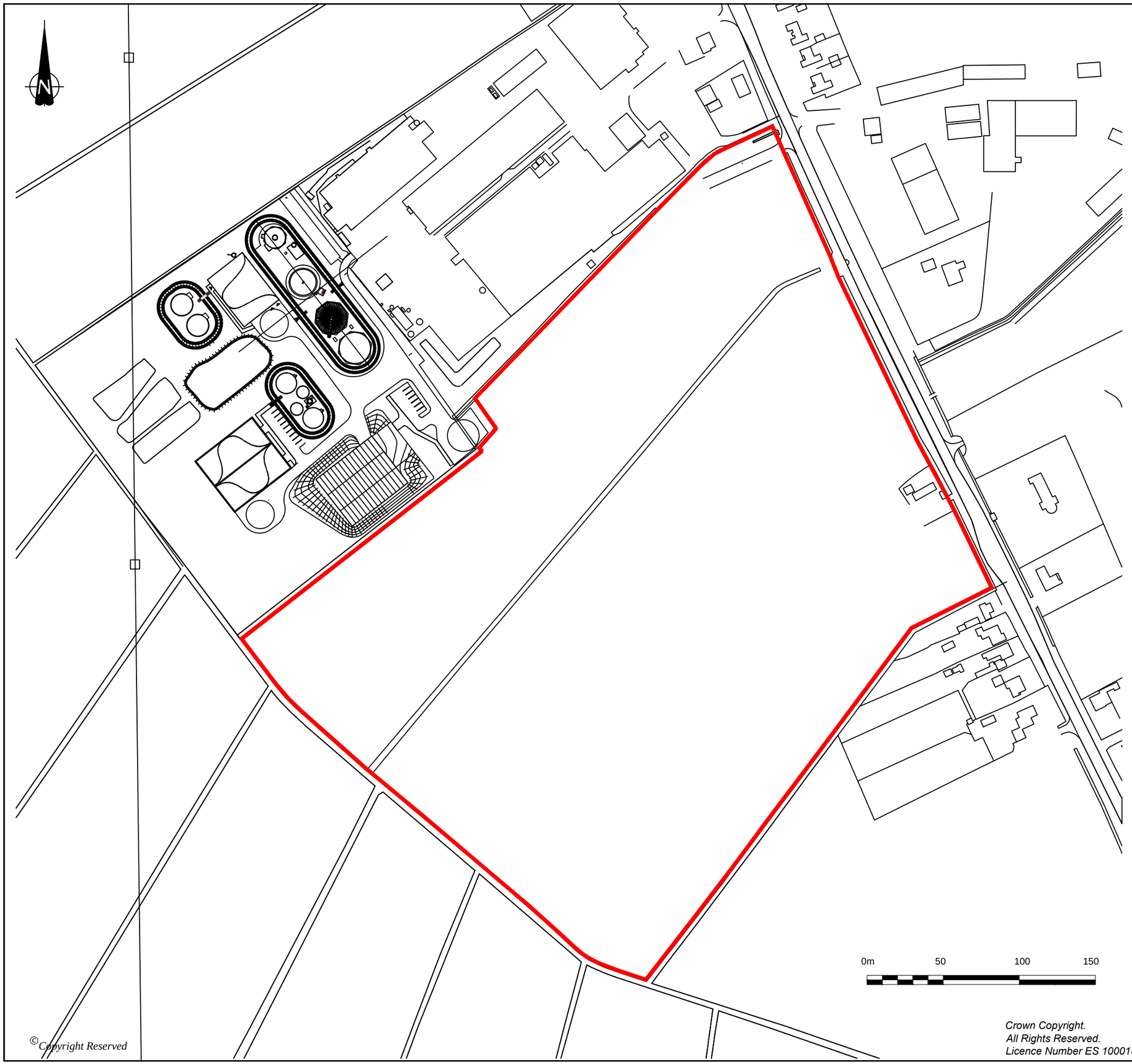
3 CONCLUSION

3.1.1 We have demonstrated that our client's proposed development site, referred to as March North West, can make a valuable contribution to the sustainable development of March. The current approach to development put forward by the Council fails to make a proper assessment of sustainable development in accordance with the key requirement of the NPPF. Sustainable development is the golden thread running through the planning system.

3.1.2 The March North West site offers the following sustainability benefits:

- Renewable energy;
- Mixed use development with a mix of employment, recreation and housing minimizing the need to travel;
- Easy pedestrian and cycle access to facilities; and
- Good public transport connections.

3.1.3 The ability to provide on-site renewable heat and power is unique to my client's site. It has not been properly taken into account by the Council in their sustainability assessment. There is a clear and simple means of remedying this, which is by the allocation of the March North West site for future mixed-use development.



DO NOT SCALE FROM THIS DRAWING

KEY

SITE BOUNDARY

REVISION	DETAILS	DATE	DRAWN	CHK'D	APP'D
B	redline adjustments to include property	03/09/12	MEF	DWB	DWB
A	First Issue	21/09/11	MEF	DWB	DWB

CLIENT

Lifecrown Investments Limited

PROJECT

Development at Westry

DRAWING TITLE

Representation Site

DRG No.	SCALE	DATE
ST11934-001	1:2500@A3	21/09/11

DRAWN BY	CHECKED BY	APPROVED BY
MEF	DWB	DWB

■ STOKE-ON-TRENT (HEAD OFFICE)	TEL 0845 111 7777	□ CARDIFF	TEL 029 2072 9191
		□ LEIGH	TEL 01942 260101
□ NEWCASTLE UPON TYNE	TEL 0191 232 0943	□ SHEFFIELD	TEL 0114 245 6244
□ WEST BROMWICH	TEL 0121 580 0909	□ EDINBURGH	TEL 0131 555 3311
□ LONDON	TEL 020 7287 2872	□ LIVERPOOL	TEL 0151 494 5431

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LIFECROWN INVESTMENTS LIMITED

AGRICULTURAL LAND
CLASSIFICATION REPORT
ON LAND AT
WISBECH ROAD, MARCH

RICHARD STOCK BSc. MIAgrE

NOVEMBER 2013

CONTENTS

1. INTRODUCTION

1.1 Lifecrown Investments Limited instructed Richard Stock to prepare an Agricultural Land Classification report on approximately 14 hectares of land at Wisbech Road, March, Cambridgeshire, PE15 OBA.

1.2 The site is located on the west side of the A141 Wisbech Road, to the northeast of March. It is centred on National Grid Reference TL 396 983 at an average altitude of approximately 0 m aod.

1.3 The report is based on a soil survey which was undertaken on 9th October 2013 by sampling soil at fifteen locations using a 1.2 metre dutch auger and spade, and examining three soil profile pits. Further information has been obtained from the MAGIC website and the Soil Survey of England and Wales.

1.4 The soil survey details have been interpreted to grade the site in accordance with the Ministry of Agriculture, Fisheries and Food Agricultural Land Classification of England and Wales (Revised Guidelines and Criteria for Grading the Quality of Agricultural Land) published in 1988. The system considers criteria relating to the **climate, site and soil.**

2. CLIMATE

2.1 Agroclimatic data for the site influences the agricultural land classification in respect of growing conditions for crops, and the soil reaction in terms of wetness and drought.

2.2 The meteorological office has published agroclimatic data for England and Wales on a five kilometre grid basis, which can be interpolated to produce data for specific grid points. Data for this site is presented in the table below.

Grid Reference	TL 396 983
Altitude - ALT	0 m
Average Annual Rainfall - AAR	545 mm
Accumulated Temperature - Jan to June - ATO	1447
Moisture Deficit Wheat - MDMWHT	121
Moisture Deficit Potatoes - MDMPOTS	117
Duration of Field Capacity - FCD	93

2.3 The climatic criteria are considered first when classifying land as climate can be overriding irrespective of soil and site conditions. The main parameters used in the assessment of climatic limitation are Average Annual Rainfall (AAR), as a measure of overall wetness, and Accumulated Temperature (ATO, Jan to June), as a measure of the relative warmth of the area.

2.4 On the basis of Rainfall and Accumulated Temperature, there is no climatic limitation to grade.

3 THE SITE

3.1 The site comprises two blocks of land which lie either side of a drainage ditch running approximately south west from the A141. The block to the north of the ditch is rectangular approximately 450m x 100m. At the time of survey it had been left uncultivated and comprised a weed infested thin wheat crop. From the roadside it appeared to be unfarmed but within the parcel it was clear that a crop of wheat had been grown during 2013, but had

not been harvested. The western end of this parcel of land is described as non agricultural. The larger block of land to the south of the ditch is also approximately rectangular, 400m x 200m. It has been cultivated and drilled in Autumn 2013.

3.2 The land is level without any significant gradients, which might affect farming practice. It is noticeably lower than the adjacent road, which has been caused by the peat shrinkage which follows drainage and cultivation.

3.3 There is no evidence that the site is at risk of flooding or that micro-relief influences land use through frost risk. It is assumed that drainage is controlled by the local internal drainage board.

3.4 On the basis of **site** characteristics relating to gradient, microrelief and flooding there is no limitation to grade.

4 THE SOILS

4.1 The soils are described in Soil Survey of England and Wales Bulletin 13 (Soils and Their Use in Eastern England), and identified on the 1:250,000 soil map of England and Wales. The information given in the Bulletin and maps is limited in several ways and is not a definitive soil description. Firstly, soil patterns in England and Wales are commonly complex and vary greatly in composition. Secondly, the minimum area that can be shown on the map is 0.5 km^2 and because of this many soil associations include small patches of soils which, at a larger scale, would be correlated with a different map unit. It is therefore noted that within the limitations of the map, the site is dominated by soils in the Downholland 1 Association, which includes soils in the Downholland, Eastville and Chatteris soil series.

4.2 The Downholland Association consists of clayey humic (organic) alluvial soils. The subsoil is gleyed as an indication of periodic waterlogging. As the organic peat cover in the fens has wasted the association has become extensive in Cambridgeshire, Norfolk and Lincolnshire. Bulletin 13 describes a typical soil profile in the association as very dark grey humose (organic) silty clay topsoil overlying dark grey stoneless silty clay with many ochreous mottles. The subsoil structure tends to be coarse angular blocky or prismatic. The mottling and the subsoil structure are indicators of slowly permeable soil layers resulting in drainage impedence.

4.3 The detailed soil survey records the soil profile at 15 auger borings and three soil profile pits. The results are presented at Appendix 1. The detailed survey accords with the broad description of the Association and confirms that the land is predominantly organic silty clay topsoil overlying slowly permeable silty clay subsoil. However, at a number of survey locations, on the east side of the site, the organic matter levels in the topsoil are too low to be classified as organic topsoil. The cut-off between organic and mineral soil is 10%.

4.4 The typical soil profile comprises very dark grey or dark greyish brown silty clay topsoil overlying dark grey silty clay. The organic matter content of the topsoil is predominantly >10%, which classifies it as organic. Where the organic content is <10% bordering the Wisbech Road it is classified as a mineral topsoil. At a few locations (augers 10, 11, 13) along the southeast boundary, the organic content is considered to be only marginally >10%.

4.5 The subsoil structures described in the three soil profile pits indicate that where the subsoil is severely mottled, it is slowly permeable.

5. AGRICULTURAL LAND CLASSIFICATION

5.1 The site was graded by applying the survey details to the Ministry of Agriculture, Fisheries and Food Guidelines for Agricultural Land Classification (October 1988).

5.2 A series of Provisional ALC maps were produced at a scale of 1 inch to 1 mile between 1967 and 1974. These maps were intended for guidance only for strategic planning purposes and were not based on detailed survey work. A new series of soil maps at a scale of 1:250,000 based on the same information are available on MAGIC, an interactive, geographical information website. The 1:250,000 map for the area shows the site to be Grade 1. The current classification system was adopted in 1988 and was a refinement of the previous system.

5.3 The agricultural land classification system provides a framework for classifying land according to the extent to which it's physical or chemical characteristics impose long-term limitations on agricultural use. The limitations can affect the range of crops that can be grown, the level of yield, the consistency of yield and the cost of obtaining it. The principal factors considered are **Climate, Site and Soil**. These factors, together with interactions between them, form the basis for classifying land into one of five grades. Grade 1 is land of excellent quality and grade 5 is very poor. Grade 3 is divided into sub-grades 3a and 3b since this grade covers about half of England and Wales. The grade or sub-grade is determined by the most limiting factor present.

5.4 On this site there is no limitation to grade according to **Climate**.

5.5 The assessment of **Site** factors considers the way the topography affects agricultural machinery use and crop production. This site comprises very gently graded land which has shrunk below the level of the adjacent road through peat wastage. It fundamentally offers no restrictions to agricultural use and cropping potential. The main consideration in applying the ALC system on this site, therefore relates to Soil factors and Interactive limitations.

5.6 The main **Soil** properties, which may affect cropping potential, are texture, structure, depth, stoniness and chemical fertility. The land has been actively farmed for generations and there are no overriding limitations caused by the individual soil factors.

5.7 The remaining consideration for ALC grading on this site relates to **Interactive** limitations, principally wetness and drought.

5.8 Regarding soil wetness, the ALC System first determines the Wetness Class (WC) of the soil profile. This is done graphically by comparing Field Capacity Days (FCD) as a measure of the wetness of the area, against the depth to a slowly permeable layer (SPL). On this site a slowly permeable layer occurs at a depth of about 45cm, which is consistent with the occurance of severe ochreous mottling. The ALC grade is then determined by comparing the WC against the topsoil texture and the FCD.

5.9 Where the topsoil is organic silty clay the land is classified as grade 3a, but where the organic matter content falls below 10% the topsoil is described as a mineral soil and is grade 3b. The grade 3b land occurs in a strip about 100m wide bordering the A141 on the east boundary. The remainder of the agricultural land is grade 3a, although the organic content of the land on the southeast boundary makes it borderline with grade 3b.

5.10 Calculations of moisture balance for the profile pits are shown in Appendix 1. The grade according to droughtiness criteria is grade 3a for mineral topsoil and grade 2 for organic topsoil and is therefore not more limiting than the grading according to wetness.

5.11 It is concluded that the site comprises land in grades 3a and 3b, and a small non agricultural area in the northwest corner.

5.12 The distribution of grades is shown on the Agricultural Land Classification Plan reference M11/2 and presented in the table below

Grade	Area (Ha)	%
3a	8.3	56
3b	4.5	30
non ag	2.0	14
Total	14.8	100

APPENDIX 1

Schedule of Auger Borings and
Soil Pit Descriptions

KEY

Colour

Vdg	very dark grey
Dg	dark grey
Lg	light grey
dgb	dark greyish brown
gb	greyish brown
b	brown
ob	orange brown
pob	pale orange brown

Mottling and Gleying

x	few and faint
xx	many
xxx	common

Texture

org	(prefix) organic
zc	silty clay
zcl	silty clay loam
scl	sandy clay loam

SCHEDULE OF AUGER BORINGS AND PROFILE PITS

LAND AT WISBECH ROAD, MARCH

Auger No	Depth cm	Colour	Texture	gley	Observations	ALC Grade
1	0-30	vdg	org zc	x		3a
	30-90	dg	zc	xxx	severe ochreous mottles	
	90+	g/dg	zc	xxx	severe ochreous mottles	
2	0-30	vdg	org zc			3a
	30-50	vdg	zc	xxx	severe ochreous mottles	
	50-90	dg	zc	xxx	severe ochreous mottles	
	90-110	dg	szl	xxx		
3	0-30	dgb	zc	x		3b
	30-45	g	zc	xxx	severe ochreous mottles	
	45-70	ob	zc	xxx	severe ochreous mottles. Inclusions of sand	
	70-110	g	zc	xxx		
4	0-15	dgb	scl	0	slight stone	3b
	15-32	dgb	scl	xx	slight stone	
	32-43	pob	sc	xxx	severe ochreous mottles	
	43-60	ob	ms	x	occasional small gravel	
	60				struck stone. impenetrable	
5	0-30	dgb	zcl	x		3b
	30-45	dgb	zc/zcl	x		
	45-70	gb	zc	xxx	severe ochreous mottles	
	70				struck stone	
6	0-30	vdg	zc		mineral/organic borderline	3a/b
	30-45	vdg	zc	xx		
	45-70	dg	zc	xxx	severe ochreous mottles	
	70-85	b	zc	xxx	severe ochreous mottles	
	85-100	lg	scl	xx		
7	0-30	vdg	org zc			3a
	30-45	vdg	zc	xx	severe ochreous mottles	
	45-70	dg	zc	xxx	severe ochreous mottles	
	70-85	b	zc	xxx		
	85-100	lg	scl	xx		
8	0-30	dgb	org zc	x	no stone	3a
	30-70	gb	zc	xxx	severe ochreous mottles	
9	0-42	vdg	org zc	0		3a
	42-70	dg	zc	xxx	severe ochreous mottles	
	70-90	g	zc	xxx	severe ochreous mottles	
10	0-42	vdg	zc	0	organic/mineral borderline	3a
	42-70	dg	zc	xxx	severe ochreous mottles	
	70-90	g	zc	xxx	severe ochreous mottles	

Auger No	Depth cm	Colour	Texture	gley	Observations	ALC Grade
11	0-30 30-45 45-70 70-110	vdg vdg dg g	zc zc zc zc	x xxx xxx xxx	organic/mineral borderline severe ochreous mottles severe ochreous mottles severe ochreous mottles	3a
12	0-30 30-45 45+	dgb dgb b/ob	zcl zc zc	x xxx xxx	mineral severe ochreous mottles severe ochreous mottles	3b
13	0-30 30-45 45-70 70	vdg b gb	zcl/zc zc zc	x xxx xxx	organic/mineral borderline severe ochreous mottles severe ochreous mottles struck stone	3a/b
14	0-30 30-45 45	vdg ob	zcl zc	0 xxx	mineral severe ochreous mottles struck stone	3b
15	0-30 30-70+	vdg dg	zc zc	0 xxx	organic/mineral borderline severe ochreous mottles	3a/b

PROFILE PIT DESCRIPTIONS

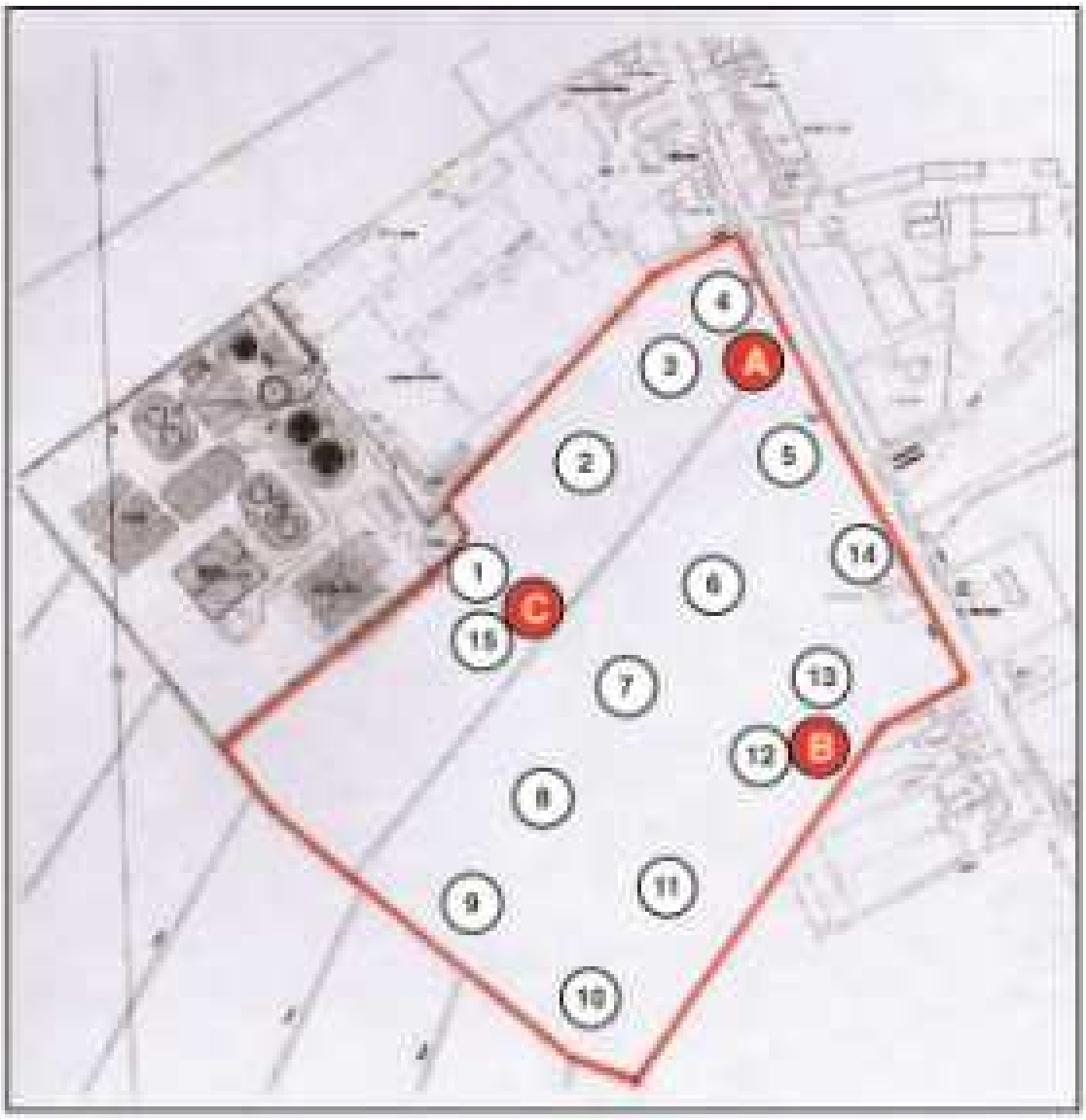
Pit A Auger 4	0-32	dark greyish brown silty clay. Slight stone. Non calcareous. Cultivation layer. Organic matter estimate <10%.
	32-60	Greyish brown silty clay. Very slightly calcareous. Inclusions of orange brown silty clay. Well developed coarse angular blocky. Severe gleying and manganese concretions. Slowly permeable layer.
	60-90	Grey clay. Strong coarse prismatic. Severe gleying. Slowly permeable layer.
	90	Pit ends
	Wetness	***Slowly permeable layer above 53 cm. Wetness class 3 combined with non calcareous silty clay topsoil places this profile in grade 3b.***
	Drought	***MBWht +4, MBPots -17 Grade 3a***

Pit B Auger 12	0-30	dark greyish brown silty clay to silty clay loam. Organic matter content estimate < 10%. Cultivation layer.
	30-45	dark greyish brown to brown silty clay. Moderate medium to coarse angular blocky.
	45-80	brown silty clay. Severe ochreous mottling on ped faces. Well developed coarse prismatic. Slowly permeable layer.
	80	Pit ends
	Wetness	***Slowly permeable layer above 53 cm. Wetness class 3 combined with non calcareous silty clay topsoil places this profile in grade 3b. The organic matter content of the topsoil is based on hand texturing.***
	Drought	***MBWht +4, MBPots -17 Grade 3a***

Pit C Auger 15	0-30 30-70 70 **Wetness** **Drought**	very dark grey silty clay. Organic matter content estimate < 10%. Laboratory test organic matter 10.2%. Marginal organic/mineral. Cultivation layer dark grey silty clay. Severe ochreous mottling on ped faces. Well developed coarse prismatic. Slowly permeable layer. Pit ends ***Slowly permeable layer above 53 cm. Wetness class 3 combined with non calcareous organic silty clay topsoil places this profile in grade 3a. Note that the organic content at 10.2% only just qualifies as organic.*** ***MBWht +21, MBPots 0 Grade 2***

PLANS

1. **Soil Survey Locations (M11/1)**
2. **Agricultural Land Classification (M11/2)**



LEGEND	
Auger location	1
Pit location	A
Survey boundary	

CLIENT	Lifecrown Investments Ltd
SITE	Land Off Wisbech Road
TITLE	Soil Survey Locations
SCALE	NTS
DATE	October 2013
REF	M11/1

N

LEGEND	
Grade 3a	
Grade 3b	
Non-agricultural	
Survey boundary	

CLIENT	Lifecrown Investments Ltd
SITE	Land Off Wisbech Road
TITLE	Agricultural Land Classification
SCALE	NTS
DATE	October 2013
REF	M11/2

N

Our ref: DWB/ST10728/J01 *Date*: 15 October 2008
Your ref:

Mr C Hodson
Fenland District Council
Fenland Hall
County Road
March
PE15 8NQ

Dear Mr Hodson

Proposed Zero Carbon Mixed Use Development at Westry

Further to our previous meetings with Gary Garford, Nigel Brown and yourself, we would be grateful if you would consider the mixed use development of the land edged red on the attached plan as part of the emerging Local Development Framework. Our clients are Local Generation, a newly formed company. Local Generation is part-owned by Lifecrown Investments Limited; Lifecrown also owns the prominent local company Fenmarc Produce Limited. Local Generation accept that the proposal is perhaps being put forward later in the process than some of the other sites which you have previously considered. However, our clients are not property developers. The opportunity has arisen as a result of Fenmarc Produce exploring environmental enhancement initiatives as part of the continual review of its existing business.

The proposal that our clients wish to be brought forward is a zero carbon mixed use development consisting of a continuation of the existing food processing activities and the addition of a quality hotel, employment and housing. The proposed development will draw all heat and power from an embedded anaerobic digestion (AD) plant which it is proposed to construct within the existing Fenmarc factory site.

The AD plant will manage food processing by products, much of which currently goes to landfill, turn this into bio-gas which will then be used to generate electricity, and leave a by product which can be sold as a high quality soil conditioner. The AD plant will supply all of the electricity needed for the factory and a surplus which can be exported and will be sufficient for the needs of approximately 1,500 dwellings. To ensure the viability of the AD plant, it is crucial to avoid simply sending all of the electricity generated to the National Grid, who would penalise our clients heavily on the price paid for the electricity they supply. It is our clients' view that all AD plants will need to be able to export electricity to local customers to realise a fair market price for long-term viability of their AD business model. Our client's proposal for an embedded AD plant and mixed use development facilitates this.

A major by-product of this electricity generation will be heat. The existing factory will utilise some of the heat for hot water and space heating. However, the un-harnessed remaining heat would need to be vented to the atmosphere, as is the case with the majority of power plants. Clearly, this is a waste of a valuable resource. It was the desire to make the best possible use of the electricity, heat and other resources provided by the AD plant that prompted our clients to consider the opportunities for built development on this site. Quite simply, having local customers for both electricity and heat, with a smoother, more balanced demand across the 24 hours of the day and night due to the mix of commercial and domestic use, is essential. Our client imagines using energy from the AD plant to provide cost-effective overnight water heating, for example, on a competitive and very green low tariff, to every dwelling and commercial property in the proposed development.

During the summer there will still be a requirement for hot water to supply the processes on site, within the hotel and domestic properties for bathing etc. and, to a lesser extent, in the business park, but of course there will not be a requirement for space heating. There is a growing demand for air conditioning, a substantial user of energy. One of the advantages of the centralised system proposed is that during the summer months the available heat can be used for cooling through the application of the inverse heat principle. This is a relatively simple process, but is reliant upon relatively expensive technology and is most economical when undertaken on a large scale. Clearly, as climate change continues the desire for cooling generally, and air conditioning in particular, will increase the consumption of fossil fuels unless more efficient means of providing them can be found. That is precisely what the current development is putting forward and will further contribute towards providing a truly zero carbon development.

Attached is a plan showing the area where our clients are seeking an allocation in the Local Development Framework. There is the opportunity on this site to create a truly green mixed use employment and residential community. The development will derive all heating and power from the embedded anaerobic digestion plant. It will be constructed using low embodied energy techniques with materials from renewable sources.

The development will also make a significant and positive impact on water usage. The factory site is currently a net importer of mains water and any standard commercial or residential development on site would only increase the site's water demand significantly. However, this proposal includes extensive rainwater collection systems built into the new building designs. It will also incorporate natural organic water treatment facilities and reed beds to clean all possible sources of effluent water from the factory, offices, houses and the AD plant to a grey water standard as a minimum. This grey water will be used to flush toilets, wash cars, etc across the whole site, thereby minimising the use of mains water. Put simply, the whole development will use organic and sustainable waste processing techniques to absorb all of the waste water, will not rely on external waste water treatment and will be largely self supporting in terms of water supply requirements.

The proposals will include a high quality hotel with conference and banqueting facilities, 30,000 m^2 of business space, focussed primarily at the office / research and development portion of the market, but with opportunities for both start up business and low volume manufacturing/prototyping. In addition there will be 418 dwellings, 35% of which will provide affordable housing. All new buildings in the development will be built to zero-carbon standards. The development will also include a range of associated infrastructure and community facilities necessary to deliver a truly sustainable zero carbon community.

As previously indicated, the proposals for the development on this site are being put forward after the LDF consultation phase has closed, albeit that the Council have not yet made a formal decision as to the preferred options for development that will be placed before an Inspector. PPS 12 : Local Spatial Planning has put delivering sustainable development at the heart of the Development Plan process. The document also emphasises the importance of early engagement in the plan making process and swift delivery of plans. However, PPS12 places great importance on flexibility and goes to great pains to emphasise the necessity of properly considering alternative development options. The PPS also emphasises the need for flexibility in the consideration of options and of future development and indicates that Inspectors will wish to satisfy themselves at the examination stage that the documents have fully taken into account reasonable options for development and are sound.

In order to assist the Council by ensuring adequate information is available upon which to base their decision making, Wardell Armstrong have undertaken an environmental assessment of the site and also undertaken comparative analysis using the same methodology and scoring system as the Council to provide guidance as to how the proposals fit into the overall framework of sites in sustainability terms. The extended phase 1 assessment undertaken indicates that there are no matters where the proposed development could not be acceptably undertaken. In addition to this assessment a detailed analysis has been undertaken using the methodology and scoring system that the Council used in identifying preferred options. A copy of this is attached. This quite clearly demonstrates that the site is appropriate for allocation for future mixed use development. Indeed the Council have already indicated the suitability of the general location for development and identified that the southern portion of the site is suitable for employment uses.

It became apparent in the course of undertaking the assessment that the criteria identified by the Council did not reflect the increased emphasis on achieving sustainable development in the latest Government policy, particularly the latest PPS12 published in June 2008. In order to assist the Council we would therefore be prepared to undertake an assessment of the alternative housing options based upon the latest guidance on site scoring set out in the Governments eco-town guidance. This should give a more comprehensive assessment of the overall sustainability of the various development sites considered and may also be of assistance to the Inspector in considering the soundness of the plan.

In closing, our clients are keen to bring forward an anaerobic digestion plant as part of the existing Fenmarc factory at an early stage and that this is entirely consistent with the Development Plan and national guidance. Installation of the anaerobic digestion plant will help to secure the long term future of the existing Fenmarc factory. This represents a significant investment in both the plant and in Fenland. Our client is ready to make this significant investment, but it will work in practical terms only as part of a whole development package. To install the plant without making best use of all available resources would harm the financial viability of the scheme and put the proposals at risk. They feel in addition that the wider proposed development represents a highly sustainable form of development and wish you to consider allocation of the site for a zero carbon mixed use development.

Should there be any further information you would wish to receive, please contact us.

Yours sincerely
for Wardell Armstrong LLP

DAVID BRIDGWOOD
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Enc

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wardell armstrong
your earth our world

Our ref: CAH/DB/CS/ST11934/LET-001 *Date*: 22 September 2011
Your ref:

Carl Suckling
Fenland District Council,
Fenland Hall,
County Road,
March
PE15 8NQ

Dear Mr Suckling

RE: LETTER OF REPRESENTATION IN RESPECT OF THE EMERGING FENLAND LOCAL DEVELOPMENT FRAMEWORK FOR A LOW CARBON MIXED USE DEVELOPMENT AT WESTRY, CAMBRIDGESHIRE

Wardell Armstrong LLP (WA) have been commissioned by Lifecrown Investments Ltd to submit a representation for a low carbon mixed used development, edged red on the accompanying plan, as part of your emerging Local Development Framework.

Our client, Lifecrown, owns the prominent local company Fenmarc Produce Limited and is part owner of Local Generation Ltd, a renewable energy company.

Currently three preferred areas have been identified for housing in March (Policy CS7). Whilst the site selection approach the Council have put forward is simple and superficially attractive in prioritising the most sustainably located site for development, this is in reality an over simplistic approach. There is considerably more to the consideration of sustainability than clustering new housing next to existing development.

You will recall that we wrote to you in October 2008, pulling forward our clients site and drawing attention to the highly sustainable nature of the location and of our development proposals. Given the location and sustainability credentials of our clients' site it will positively contribute to achieving the vision for the district.

The proposed mixed use development will consist of the following elements:

- Retention of existing packing plant;
- Local Generation's Anaerobic Digestion (AD) facility (construction almost complete);
- High quality hotel with conference and banqueting facilities;
- 30,000 m^2 of "Greenboost" business space, comprising a mix of business types including office/research and development;

- "Greenboost" residential development to include the appropriate affordable housing provision;
- Community facilities.

In preparing this proposal regard has been given to the overall sustainability of the site in terms of energy, employment, transport, sustainable construction, social cohesion and the environment. Each aspect of the proposed development has taken into account existing and evolving national guidance, e.g. the National Planning Policy Framework (NPPF), to maximise the benefits of the scheme.

Renewable energy and heat

The proposed development will be supplied with a renewable source of electricity and heat from an on-site AD facility, currently under construction at the site and due to be commissioned in October. The AD plant will accept a range of organic waste from the local area in order to generate a renewable supply of electricity, heat and soil conditioner whilst also diverting waste streams from landfill. A second phase is proposed to commence in 2012 which will increase the capacity of the AD plant to 70,000 tonnes providing sufficient energy and heat to meet the needs of the proposed development with any excess sold to the National Grid.

As previously mentioned a major by-product of electricity generation will be heat. The existing factory will utilise some of the heat for hot water, space heating and refrigeration. However, the un-harnessed remaining heat would need to be vented to the atmosphere, as is the case with the majority of power plants. Clearly, this is a waste of a valuable resource. It is a desire to make the best possible use of the electricity, heat and other resources provided by the AD plant that prompted our clients to consider the opportunities for built development on this site. Having local customers for both electricity and heat, with a smoother, more balanced demand across the 24 hours of the day and night due to the mix of commercial and domestic use, is essential and this has been a factor in the evolution of a mixed use proposal. Our client seeks to establish a CHP district heating network to provide cost-effective heating, on a competitive green tariff, to every dwelling and commercial property in the proposed development.

During the summer there will still be a requirement for hot water to supply the processes on site, within the hotel and domestic properties for bathing etc. and, to a lesser extent, in the business park, but of course there will not be a requirement for space heating. There is a growing demand for air conditioning, a substantial user of energy. One of the advantages of the centralised system proposed is that during the summer months the available heat can be used for cooling through the application of the inverse heat principle. This is a relatively simple process, but is reliant upon relatively expensive technology and is most economical when undertaken on a large scale and in buildings purpose designed for the process. Clearly, as climate change continues the desire for cooling generally, and air conditioning in particular, will increase the consumption of fossil fuels unless more efficient means of providing them can be found. That is precisely what the current development is putting forward and will further contribute towards providing a low carbon development.

The proposed development would represent an exemplar low carbon scheme which utilises a range of renewable and low carbon technologies in accordance with national sustainability guidance. It is the aim of our client that the proposals will be seen as a beacon of sustainability. It is considered that the proposed development represents a prime opportunity for March and the wider Fenland District.

Sustainable Movement

The site has excellent pedestrian access and is situated within 15 minutes walk of all local amenities, medical facilities, employment, schools and March town centre. There is also excellent cycle access on to National Cycle Route 63 and beyond. Frequent bus services operate along the A141 Wisbech Road which connects the proposed development site with March railway station and March Town Centre. There are regular direct train services which operate between March and various destinations including Peterborough, Cambridge, Ely and Stanstead Airport. As part of the proposals 30,000m^2 of business space will provide employment for residents and others from the local area.

Statutory and Non Statutory Designated Sites

The site is not located within 1000m of any statutory or non statutory designated conservation or cultural heritage assets.

Community Benefits

As part of the proposals a community facility will be developed to provide a focal point for local residents to meet. This will be designed in cooperation with the local community to ensure it meets their needs. It will be an integral part of the overall community.

Natural Resources

The development will also make a significant and positive impact on water usage. The factory site is currently a net importer of mains water and any standard commercial or residential development on site would only increase the site's water demand significantly. As part of the anaerobic digestion development currently under construction, an organic water treatment plant will be developed. This will take waste water from the factory, and the AD plant, treating it to a grey water standard as a minimum. This grey water will be used to flush toilets, wash cars, etc across the whole site, thereby minimising the use of mains water. Ultimately it is intended, subject to regulatory approval, to treat the water in the organic plant to potable standard, such that the site will be totally self sufficient in water treatment and supply. Put simply, the whole development will use organic and sustainable waste processing techniques to absorb all of the waste water, will not rely on external waste water treatment and will be largely self supporting in terms of water supply requirements.

Sustainable Construction

The development will take into account sustainable construction best practice and will be built to BREEAM and Code for Sustainable Homes (CfSH) standards. All buildings will be energy, heat and water efficient with construction materials responsibly sourced, to ensure the overall carbon

footprint of the development is minimised. Climate change is a growing concern, as such the proposals will be designed and built to maximise adaptation to potential impacts and minimise greenhouse gas emissions.

Conclusion

The site that we are promoting on behalf of our client will clearly positively contribute to achieving the vision for the District and therefore should be included in the Fenland Local Development Framework. The proposals will be built to the highest sustainability principles and will provide valuable employment opportunities and homes with a sizeable affordable housing element fully in line with national policies and advice.

The location adjacent to the existing AD plant offers substantial opportunities not available on any of the other sites put forward by the Council. The proposed site scores at least as well on accessibility and acceptability tests as any of the proposed sites identified by the Council. Overall development in this specific location offers significantly greater sustainability benefits than any of the sites identified as preferred options by the Council.

The current approach followed in the LDF, by taking an overly simplistic approach to site allocation, has failed to take into account a highly sustainable development opportunity. It is understood that there will be a more detailed site assessment process undertaken, but the approach being proposed by the Council would effectively exclude our client's site and represent a major wasted opportunity.

I formally request that this representation be taken into account in the preparation of the Fenland Local Development Framework. We would like the chance to discuss the opportunities presented by the Westry site with officers and members, and to give you the opportunity to view the site and the AD plant. Should any further information be required in support of the representation, we will provide it.

Yours sincerely
for Wardell Armstrong LLP

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Our ref: SMS/DWB/SM/ST11934/LET-002 *Date*: 5 September 2012
Your ref:

mailto: neighbourhoodstrategy@fenland.gov.uk

Neighbourhood Strategy (Planning Policy) Team
Fenland District Council
Fenland Hall
County Road
March
PE15 8NQ

Dear Sirs,

RE: LETTER OF REPRESENTATION IN RESPECT OF FURTHER DRAFT CORE STRATEGY REGARDING PROPOSED LOW CARBON MIXED USE DEVELOPMENT AT WESTRY, CAMBRIDGESHIRE

Wardell Armstrong LLP (WA) have been commissioned by Lifecrown Investments Ltd to submit a representation for a low carbon mixed use development, edged red on the accompanying modified plan, as part of your consultation on the further draft of your Core Strategy.

Our client, Lifecrown, owns the prominent local company Fenmarc Produce Limited and is part owner of Local Generation Ltd, a renewable energy company.

You will recall that we wrote to you in October 2008 and September 2011, putting forward our client's site and drawing attention to the highly sustainable nature of our development proposals. Given the sustainability credentials of our client's site it would positively contribute to achieving both the new NPPF's presumption in favour of sustainable development and your own vision for the Fenland District by virtue of its demonstrable economic benefits. It is also fully aligned with the Fenland Neighbourhood Planning Vision of growth to build a stronger, better and more sustainable District.

Currently three preferred areas have been identified for housing in March (Policy CS7). Whilst the site selection approach the Council have put forward is simple and superficially attractive in prioritising the most sustainably located site for development, there is considerably more to the consideration of sustainability than clustering new housing next to

existing development. In recognition of this we do however note, and strongly support, your presumption in favour of sustainable development, as set out in your draft plan (3.1.1 and 3.1.2). We are therefore disappointed that the clear sustainability benefits of our proposed development do not seem to have been taken into account in the identification of areas for development in the Core Strategy.

Lifecrown are seeking the support of the District Council in promoting its Core Strategy as a flexible framework to encompass growth which is not restrictive to locations of opportunity for development. We would request that the further Draft Core Strategy provides appropriate criteria based promotional policy within which we can further plan to develop future investment with confidence.

The proposed mixed use development will consist of the following elements of economic sustainability as a 'Greenboost':

- Retention of existing packing plant;
- Local Generation's Anaerobic Digestion (AD) facility (phase one of which is fully operational);
- Commercial/Employment space of approximately 7,000 square metres; which could comprise a number of units for multiple employers or space for an anchor site for one major employer;
- Office space of approximately 2,300 square metres; flexibly offered either to support the commercial space or stand alone;
- A small retail offer to support local convenience, say 800 square metres;
- Hotel space of around 2,000 square metres;
- "Greenboost" residential development of up to 430 houses to include appropriate affordable housing provision.

In preparing this proposal regard has been given to the overall sustainability of the site in terms of energy, employment, transport, sustainable construction, social cohesion and the environment. Each aspect of the proposed development has taken into account national guidance, primarily the NPPF, to maximise the benefits of the scheme.

Renewable energy and heat

The proposed development will be supplied with a renewable source of electricity and heat from the existing on-site AD facility. The AD plant accepts a range of organic waste from the local area, diverting waste streams from landfill, in order to generate a renewable supply of electricity, heat and soil conditioner as part of a closed loop process. The AD plant is

currently embarking on the second phase in its development which will increase its capacity to 70,000 tonnes, providing sufficient energy and heat to meet the entire needs of the proposed development with the excess sold to the National Grid.

As previously mentioned a major by-product of electricity generation will be heat. The existing factory will utilise some of the heat for hot water, space heating and refrigeration. However, the un-harnessed remaining heat would need to be vented to the atmosphere, as is the case with the majority of power plants. Clearly, this is a waste of a valuable resource. It is a desire to make the best possible use of the electricity, heat and other resources provided by the AD plant that prompted our clients to consider the opportunities for built development on this site. Having local customers for both electricity and heat, with a smoother, more balanced demand across the 24 hours of the day and night due to the mix of commercial and domestic use, is essential and this has been a factor in the evolution of a mixed use proposal. Our client seeks to establish a CHP district heating network to provide cost-effective heating, on a competitive green tariff, to every dwelling and commercial property in the proposed development.

During the summer there will still be a requirement for hot water to supply the processes on site, within the hotel and domestic properties for bathing etc. and, to a lesser extent, the business element, but of course there will not be a requirement for space heating. There is a growing demand for air conditioning, a substantial user of energy. One of the advantages of the centralised system proposed is that during the summer months the available heat can be used for cooling through the application of the inverse heat principle. This is a relatively simple process, but is reliant upon relatively expensive technology and is most economical when undertaken on a large scale and in buildings purpose designed for the process. Clearly, as climate change continues the desire for cooling generally, and air conditioning in particular, will increase the consumption of fossil fuels unless more efficient means of providing them can be found. That is precisely what the current development is putting forward and will further contribute towards providing a low carbon development.

The proposed development would represent an exemplar low carbon scheme which utilises a range of renewable and low carbon technologies in accordance with national sustainability guidance. It is the aim of our client that the proposals will be seen as a beacon of sustainability. It is considered that the proposed development represents a prime demonstration opportunity for March and the wider Fenland District.

Sustainable Movement

The site has excellent pedestrian access and is situated within 15 minutes walk of all local amenities, medical facilities, employment, schools and March town centre. The proximity of the site to National Cycle Route 63 also provides excellent cycle access. Frequent bus services operate along the A141 Wisbech Road which connects the proposed development site with March railway station and March Town Centre. There are regular direct train services which operate between March and various destinations including Peterborough, Cambridge, Ely and Stanstead Airport. As part of the proposals around 10,000 square metres of business space will provide employment for residents and others from the local area.

Statutory and Non Statutory Designated Sites

The site is not located within 1000m of any statutory or non statutory designated conservation or cultural heritage assets.

Conclusion

The site that we are promoting on behalf of our client will clearly positively contribute to achieving the vision for the District and therefore should be supported by the Fenland Draft Core Strategy. The proposals will encompass the sound sustainability principles and will provide valuable employment opportunities and a mixed housing offer including an appropriate affordable housing element.

The location adjacent to the existing AD plant offers substantial opportunities not known to be available on any other proposed development site. Overall, development in this specific location offers significant sustainability benefits.

I formally request that this representation be taken into account in taking forward the Fenland Local Plan Core Strategy. We have already discussed the opportunities presented by the Westry site with officers and members, and look to be further developing our proposals as a matter of priority.

Yours sincerely
for Wardell Armstrong LLP

DAVID BRIDGWOOD
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wardell armstrong
your earth our world

Our ref: DB/VW/ST11934/LET-003 *Date*: 10 April 2013
Your ref:

Neighbourhood Strategy (Planning Policy) Team,
Fenland District Council,
Fenland Hall,
County Road,
March,
Cambridgeshire,
PE15 8NQ

Dear Sirs

Fenland Core Strategy – Proposed Submission Consultation 2013

As you are aware, our clients have actively engaged in the preparation of the Core Strategy document since making initial representations to you in 2008. Further representations have then been made consistently in September 2011 and September 2012. Copies of all of these representations are attached. The nature of the representations we have provided previously have been in simple terms to point out the significant sustainability benefits of the site we propose to develop adjacent to the existing vegetable packing plant and anaerobic digestion (AD) facility at Westry, on the edge of March.

Our proposals are for a mixed-use community that includes employment and commercial facilities, as well as residential and supporting recreational and community facilities, giving the opportunity to live and work on the same site and avoiding the need to travel. The proposed development will deliver a truly sustainable community by harnessing heat and electricity from the existing AD plant, already fully operational on site. An illustrative master plan demonstrating the way in which the site could be developed has already been provided to the Council, and a further copy is attached for information. It is intended that this illustrative master plan will be developed with the local community and Council as the development is brought forward to the planning stage. That approach reflects the way in which the AD scheme was developed on the site.

We have previously made clear the significant sustainability benefits of the development proposed. The mix of uses put forward has been selected to balance the use of the AD plant's outputs. The result is a development that will be highly sustainable. However, it is noted that little weight has been given to this within the assessment undertaken by the Council. We believe this to be incorrect.

noted that little weight has been given to this within the assessment undertaken by the Council. We believe this to be incorrect.

With the introduction of the NPPF, Government has confirmed that the purpose of the planning system is to contribute to the achievement of sustainable development (Paragraph 6) and that a presumption in favour of sustainable development is the golden thread running through plan-making and decision-taking (paragraph 14). Paragraph 7 confirms that sustainable development has economic, social and environmental roles and paragraph 8 confirms that these elements are mutually dependent and should not be taken in isolation. We believe that in this instance the development site we have put forward meets all 3 strands of sustainable development, as is set out below.

The Core Strategy vision reflects the emphasis now placed on sustainable development, confirming that in addition to simply meeting the need to provide new residential and employment opportunities, the growth in homes and jobs will need to be closely linked to each other. This is based, in large part, on the high level of out-commuting from Fenland for work and the need to provide good quality employment to complement the new homes to be provided. The new homes provided will need to achieve higher environmental standards than homes built in previous decades, as dwellings built today will need to have a lifespan in excess of 200 years, at current replacement rates. Overall this more sustainable growth is intended to build a better, stronger and more sustainable Fenland. Clearly these goals are important and entirely consistent with NPPF.

The submission version of the plan has been significantly modified to take into account the NPPF. However, we do not feel the scoring applied to our site has given sufficient consideration to its positive sustainability benefits. We strongly believe our site to comprehensively address all aspects of sustainability, with economic sustainability delivered through on-site employment giving the opportunity for the creation of new jobs in the area, social sustainability incorporated through on-site recreational facilities, and environmental sustainability underpinning the vision with the green energy available. There are of course cross-linking elements, with the provision of a competitive green energy tariff to households offering the potential to help reduce social inequalities. The same green energy tariff is likely to prove attractive to employers seeking to minimize rising energy costs and thereby bringing employment to the area. Again helping to reduce social exclusion. Whilst we welcome the apparent flexibility in Policy CS1 to address sustainability issues, we need to ensure that this is delivered in practice. At present the final section of Policy CS4 indicates that housing proposals on the edge of market towns away from specifically identified sites or broad areas of growth will be refused. It will be important to ensure that this will not be an inappropriate obstacle to future development of sites such as ours with strong sustainability credentials. In the long term interests of sustainability, and to accord with the NPPF, policies CS1 and CS4 should be modified to better reflect the priority of delivering truly sustainable development.

Allocation of March North West

The assessment of the individual sites put forward for consideration has been set out in the Sustainability Appraisal Part 2. Our client's site is identified as March North West and the assessment begins on page 86. On the basis of the assessment provided by the Council the site has effectively been dismissed on the basis of 8 key issues. These can be summarised as:

Greenfield Status of Land;
High Agricultural Value;
Flood Zone;
Morphology;
Access Distance and Constraints;
Public Transport;
Sewage Treatment Capacity; and
Presence of Overhead Lines.

Greenfield Status: It must be remembered that there are very few areas of previously developed land around March. All of the preferred sites put forward by the Council are largely or exclusively greenfield. Greenfield status is not therefore considered to be a constraint on the development of the site.

Agricultural Quality: The Fenland district is a significant area of agricultural production, and is known for the good quality of agricultural land. Our client's site is noted by the Council as being Grade 1 agricultural land. This is not in fact correct and whilst some of the land is grade 1, a significant proportion of the site is Grade 2 agricultural land. It must be remembered that only 1 of the preferred development sites, March East has no grade 2 land. Of the other 4 preferred sites identified by the Council all are either substantially or entirely constructed on Grade 2 agricultural land. Agricultural land classification is not therefore considered to be a constraint to development.

Flood Zone: The site is within Flood Zone 1, 2 and 3, as indicated by the EA flood map. However, it must be remembered that the assessment undertaken is based on modelled data and has been interpolated, rather than established based upon accurate topographic data. The accuracy of the assessment is therefore questionable. All of the Council preferred development locations also include Flood Zone 2 and 3. It must also be remembered that all of the sites within March are covered by various Internal Drainage Boards which employ drainage techniques to control water level and flooding. This is not taken into account in preparation of the flood zone assessments, and indeed areas of existing development in March are within Flood Zone 2 and 3, but are protected from flooding by the IDB. Flood Zone is not therefore considered to be a constraint to development.

Morphology: All of the proposed development areas will impact the morphology of the area of March. In particular, March NE, March SE and March SW will result in significant increases in the elongation of March and expansion into what is currently open, undeveloped land. In the case of March SE and March SW the Council also acknowledge that the land is currently used for informal recreation, and this will be harmed as a result of the proposed development. Whilst the severance presented by the A141 is not ideal, the severance issues can be reduced significantly, as discussed below, and indeed the presence of the A141 offers some significant advantages in terms of public transport accessibility. Morphology is not therefore considered to be a constraint to development.

Access Distance and Constraints: The council's scoring suggests the site is inferior and should be discounted as a result of the separation from the town centre, railway station, primary school and high school. It is further suggested that access to these facilities will be constrained by the crossing of the A141 and lack of pavements on the West side of the road. In terms of distance, it must be remembered that the town centre, as noted in the Council's scoring matrix, is only approximately 2km from the site. The route is flat and can be walked comfortably in under half an hour, and can be travelled in significantly less time by bicycle. Similarly the railway station is an easy walk and the primary and secondary schools are both well within the Department for Education standard acceptable walking distance of 2 miles (3.2km) and 3 miles (4.8km) respectively. All of these facilities are to the East of the development site, such that the lack of a pavement on the West side of the A141 is not considered relevant, but could in any event be provided as part of the development of the site. As the transport assessment indicates, it will be necessary to provide a minimum of 2 access points into the site. It is anticipated that the southern-most of these access points will be provided using traffic lights. This will have the advantage of smoothing and regulating the flow of traffic on the A141, but also allow for the introduction of a pedestrian phase as part of the traffic light controlled junction, allowing for safe convenient crossing. This is not therefore considered to be a constraint to development.

Public Transport: In addition to being within easy walk of the existing station the A141 has a very good bus service. Services 33 and 46 combine to provide a 30 minute service, which is as good as any of the Council preferred sites, and is significantly better than the bus service of most of the preferred sites. Public transport is not therefore considered to be a constraint to development.

Sewage Treatment Capacity: Fenland has difficulties associated with existing treatment capacity. This is an area-wide problem and none of the sites are specifically exempt from this issue. Sewage capacity is not therefore regarded as a constraint to development.

Overhead Lines: It is noted that the presence of overhead electricity lines is of concern to the Council. However, this presence has been taken into account in the indicative layout of the site and does not represent a constraint to development.

It can be seen therefore that the proposed site is broadly comparable to the sites identified by the Council on the basis of the characteristics assessed by the Council. However, we are concerned that the unique environmental sustainability benefits offered by the site have been undervalued (i.e. green electricity and district heating).

The Council have also failed to take into account the reduction in transport that will arise as a result of the provision of employment and housing opportunities on the same site. Whilst it cannot be guaranteed that people will live and work on the same site, it does at least offer the opportunity, and with the rising cost of transport we would anticipate that this will be an attractive opportunity.

None of the preferred sites proposed by the Council offer the opportunity for environmentally-sustainable development and to live and work on the same site. Allied to this we note concerns around the deliverability of 3,000 homes in Wisbech, and the Council leader's recent announcement that the Council will no longer support development in NE March. Having had a presence in March for over 40 years, our client has a genuine interest in the town's development. Our client is offering a unique proposition which is both deliverable and inherently more sustainable than the Council preferred options, and should therefore be identified for future development. Whilst we can understand that the Council might originally have been sceptical of the ability to deliver an operational AD plant on the site, and thereby deliver the energy benefits stated, there can now be no doubt that this is a truly deliverable environmentally-sustainable development, fully in line with the requirements set out in NPPF, and that the site should therefore be allocated for future mixed use development.

Yours sincerely
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