



WYG on behalf of The Church Commissioners for England (CCE)

Matter 7 – Urban Extensions (Policy CS7)

Matter 8 – Wisbech (Policy CS8)

The Church Commissioners for England

Statement for Fenland Local Plan Core Strategy Examination

Hearings Commencing 09.12.13

Arndale Court, Otley Road, Headingley, Leeds, LS6 2UJ

Tel: 0113 219 2217

Email: phil.brock@wyg.com



Contents Page

1.0	Introduction.....	1
2.0	Matter 7 – Urban Extensions (Policy CS7)	2
3.0	Matter 8 – Wisbech (Policy CS8)	4
4.0	The Case for the Strategic Allocation of the Site.....	5
5.0	Conclusions	9

Appendix Contents

Appendix 1 – Figure 1 "the Site"





1.0 Introduction

- 1.1.1 This statement is made by WYG Planning & Environment (“WYG”) on behalf of the Church Commissioners for England (“CCfE”). It is made in response to the “Matters and Issues” identified for discussion by the Inspector at the forthcoming hearing sessions for the Fenland Core Strategy (“FCS”), scheduled to commence on Monday 9 December 2013 (“Examination”). The statement supplements earlier submissions made on behalf of CCfE to various consultations on the draft FCS, the last being to the proposed submission version in May 2013.
- 1.1.2 The statement is made on the basis that the FCS is considered unsound in that it is not justified, effective or consistent with National Policy. The view is made with specific reference to FCS Policies CS7 (Urban Extensions) and CS8 (Wisbech), identified under Matters 7 and 8 respectively. Whilst the principle of the policies are supported, particularly in terms of highlighting the importance of sustainable urban extensions in meeting the plans growth strategy, the policies are worded in such a manner that they are considered ambiguous, unjustified and potentially ineffective, particularly in terms of the delivery of the housing strategy for Fenland. As such the policies are not considered consistent with the requirements of National Policy as set out in the NPPF. This is set out in detail below.
- 1.1.3 In this context the CCfE are proposing detailed consideration be given to the identification of their landholding at Harecroft Farm, Wisbech “the Site” (See Appendix 1 Figure 1) as a strategic allocation in Policy CS8, rather than its inclusion as part of an undefined broad location for growth (“BLG”). The Site makes up a considerable area of the West Wisbech BLG (30ha) and is considered suitable, available and deliverable in its own right. It is also considered that the development of this single land holding will create a clear and deliverable allocation which would not prejudice the delivery of other, potentially longer term, proposals in the wider West Wisbech BLG.



2.0 Matter 7 – Urban Extensions (Policy CS7)

2.1.1 Whilst we support the general principle of urban extensions set out in Policy CS7 we have a number of general concerns over the wording of this policy. The NPPF (paragraph 154) confirms local plans should be aspirational but realistic. There is an emphasis on the need for clear policies to facilitate clear decision making. In this context the provisions of Policy CS7 have the potential to undermine the opportunity to deliver specific developable sites to meet the housing strategy of FCS.

2.1.2 With regard to the main provisions set out in the first part of the policy, our particular concerns centre on the following:

- There is no definition of what constitutes a comprehensive scheme;
- There is no clear definition or boundary limits to the locations for growth which further confuses what represents a comprehensive scheme;
- The policy requires full stakeholder engagement and support across the whole BLG, including agreement from all significant landowners; and
- Schemes need to be in compliance with a previously agreed SPD or formal Committee Approval process.

2.1.3 Policy CS7 lacks the flexibility for schemes to come forward within the BLG for growth, relying on the assumption that coordination of a comprehensive approach, across potentially a multitude of land ownerships, can be achieved in a timely fashion. In reality, there are likely to be a range of practical and legal implications which will cause extended timescales and undermine the housing strategy. Such an approach has the potential to prejudice the delivery of individual schemes which are otherwise acceptable and which can demonstrate availability and deliverability in their own right. This highlights the merits in identifying more specific allocations within the broad locations for growth consistent with longer term objectives for the wider area.

2.1.4 The provisions set out in the second part of the policy (a) to (e) combine a mixture of aspirations and requirements, which will provide no sound basis for the consideration of individual schemes. Many of the requirements identified to meet local need e.g. education, social, health, leisure and cultural facilities will be determined by the level of development achievable within the area, which in itself is distinctly vague in the form of policy proposed.



2.1.5 The majority of these requirements will have financial implications for schemes coming forward and it is unclear how this will be assessed on a site by site basis, which highlights the inherent inflexibility of the policy. Effectively, this approach will require details of a comprehensive scheme for the whole of the location for growth to determine the pro rata contributions required for each scheme coming forward. This is unrealistic and unclear basis on which to bring forward development proposals and will raise questions over scheme viability.



3.0 Matter 8 – Wisbech (Policy CS8)

3.1.1 We broadly support the aims of Policy CS8 and in particular the proposed growth at West Wisbech. However, reflecting the comments made to Policy CS7 we consider CS8 is also ambiguous in the context of the NPPF, and fails to set out a clear policy basis for the determination of development proposals. To a degree this uncertainty is acknowledged in the wording of Policy CS 4 (part A), which sets out the housing targets and spatial distribution for the District. The pertinent point in Policy CS4 is that it states that allocations will be closely monitored subject to master planning to determine whether the 3000 homes identified are achievable.

3.1.2 Policy CS8 compounds the potential uncertainty over housing delivery through its defined objectives, requirements and the justification for those requirements. In particular, we raise the following concerns:

- We query the justification for the 750 dwelling capacity identified;
- Without a clear justification the scale of potential transport infrastructure requirements is unjustified and likely to have a significant impact on the viability and deliverability of development proposals coming forward. This is a matter for the plan to consider now, not individual development proposals; and
- We do not agree that development proposals should be required to achieve a modal shift to sustainable transport for existing communities and it is questionable how this approach could be reasonably delivered by individual development proposals in any case.

3.1.3 These principal concerns highlight the importance of identifying more definitive allocations as part of the FCS, particularly given that there is no intention by Fenland District Council to produce a Site Allocations DPD. Clearly defined allocations will enable greater clarity on the potential impact on local infrastructure and set an informed basis for subsequent planning applications.

3.1.4 On the basis of these comments, we believe that detailed consideration be given to the Site as a strategic allocation in Policy CS8, and the policy amended accordingly. The case for allocation of the Site is set out in detail in section 4.0 below and confirms that the site is suitable, available and deliverable.



4.0 The Case for the Strategic Allocation of the Site

4.1 Introduction

4.1.1 The Site makes up a considerable area of the West Wisbech BLG (30ha) and given the single ownership, the absence of any particular site constraints, the general suitability of the Site and the significant housing requirement for Wisbech, the Site is considered to be deliverable.

4.2 Site Context

4.2.1 The Site comprises 30 hectares of land primarily in agricultural use to the immediate west of the existing settlement of Wisbech. Harecroft Road lies to the east and Barton Road to the south, both of which provide access to the Site under the same ownership. The Site is bounded to the north partly by houses and partly by allotments. Further agricultural land forms the western and south-western boundaries with houses and large gardens immediately to the south.

4.2.2 The Atkins Concept Masterplan Nov 2013 (Appendix 1 Figure 1) demonstrates that the 30ha site could be developed to provide approximately 11ha net area of residential development (circa 380 dwellings), supported by a primary school and local centre facilities, if required, equating to just over 2ha net area.

4.2.3 The concept plan is supported by two key technical notes ("TN") covering "Transport" and "Flood Risk", acknowledging that these are key matters to the delivery of the proposals as reflected in the current wording of draft Policy CS8. These also address Q4 under Matter 8. Copies of the TNs can be made available on request at the hearing sessions.

4.3 Site Suitability

4.3.1 The development of the Site as a strategic allocation would represent a logical extension to the western side of Wisbech, linking the area of residential development to the north east of the site with the residential area to the south and creating a well defined edge to the settlement with the potential to link to future growth to the west.

4.3.2 The Site is predominantly greenfield and flat and, therefore, there are no significant constraints to development. There are no environmental designations on the Site confirmed by the work on an extended Phase 1 habitat survey undertaken on the site (November 2013). The general findings of the habitat survey would support the principle of development on the Site although further survey



work is recommended in the spring due to the potential for bats and barn owls, as well as water vole in the ditches (the concept plan retains the existing network of ditches).

4.4 Transport

4.4.1 In February 2013, WYG undertook a Transport TN (feasibility study), on behalf of the CCFE to determine the level of development that could be reasonably accommodated on the Site, without having a significant impact on the highway network, and therefore without the requirement for major infrastructure improvements.

4.4.2 The TN was prepared having regard for the FCS and related evidence base documents, including the Wisbech Area Transport Study and the Fenland Infrastructure Delivery Plan (FIDP), which sets out the main transport infrastructure projects necessary to help deliver the FCS.

4.4.3 The findings of the TN indicated that there is potential to accommodate up to 560 units at the Site with relatively minor improvements to the local highway network. The current concept plan indicates that around 380 units could be developed. Detailed transport modelling and the identification of appropriate mitigation measures would be carried out as part of a development proposal coming forward.

4.4.4 This approach would reflect FDC stance as set out in the Highways Statement of Common Ground (SCG) dated October 2013. Importantly the SCG concludes that there are no fundamental issues from a transport perspective related to the indicated levels of growth for Wisbech. It goes on to state, however, that it is recognised that certain mitigation measures are required for which further transport modelling and scheme development will determine the precise extent. *"Such detail will be covered by the developer(s) by way of detailed transport assessments for their proposals. All parties will continue to work together to ensure that the transport network is properly managed and developed in line with the delivery and implementation of the strategic growth target."*

4.5 Flood Risk Assessment

4.5.1 A Flood Risk TN prepared by Atkins (18.11.13) confirms the Site is located within Flood Zone 3 on the Environment Agency flood map and identifies the River Nene to the east as the potential main source of flooding. However, it confirms the river has a series of raised defences originally built in the 1980s to provide protection from the up to a 1 in 200-year flood event. These afford protection to the Site.



4.5.2 It is understood from the TN that the Environment Agency is progressively upgrading / replacing of the River Nene defences through Wisbech to maintain protection against 1 in 200-year flood event reflecting climate change since the 1980s. The first phase of this work was completed in 2010 hence the defences currently provide a 1 in 200-year standard of protection. Two further phases of raising the defence levels are planned for 2025 and 2045 to ensure that the 1 in 200-year standard of protection is maintained in line with predicted increases in flood flows and rises in sea levels over the next 50 years as a result of climate change. A proactive maintenance system has also been implemented to ensure that the defences remain fit for purpose.

4.5.3 The TN concludes, therefore, that the Site is currently protected by the upgraded flood defences and will continue be so until the mid to late 21st century.

Sequential & Exception Test

4.5.4 The TN confirms that the location of the Site within defended Flood Zone 3 means that the Sequential Test must be applied to the Site. It is understood that Fenland District Council has undertaken both a Sequential and Exception Test for the BLG as part of the emerging FCS (includes the Site) and these tests have both been passed. The risk associated with the River Nene floodplain is mitigated as a result of off-site flood defence enhancements. Other potential on-site flood risks can be managed within the site through the use of a range of appropriate industry standard practices, such as attenuation ponds, swales and the existing Internal Drainage Board maintained water course system.

4.5.5 The potential flood risks to the wider area generated by the proposed development will be managed through the design of a comprehensive surface water drainage system in accordance with industry best practice.

Surface Water Drainage – Proposed Development

4.5.6 The surface water drainage system for the proposed development (concept plan) will ensure that water is managed wholly within the site and does not adversely affect any areas beyond the site boundary.

4.5.7 The TN confirms outfalls from the proposed surface water system will be into the local drainage network owned and operated by the Internal Drainage Board (IDB). The discharge rates into this system will be agreed with the IDB. Initial discussions have indicated the required discharge rates can be achieved for the level of development indicated on the concept plan.





4.5.8 The proposed drainage system will incorporate sustainable drainage systems (SuDS) features. These will be incorporated into the landscaping scheme, providing storage, water quality enhancements, biodiversity and habitat creation benefits.



5.0 Conclusions

5.1.1 The statement is made on the basis that the FCS is considered unsound in that it is not justified, effective or consistent with National Policy. The view is made with specific reference to FCS Policies CS7 (Urban Extensions) and CS8 (Wisbech). Whilst the principle of the policies are supported, particularly in terms of highlighting the importance of sustainable urban extensions in meeting the plans growth strategy, the policies are worded in such a manner that they are considered ambiguous in the context of the NPPF and fail to set out a clear policy basis for the determination of development proposals. This will have the potential to undermine the opportunity to deliver specific developable sites to meet the housing strategy of FCS. The main concerns for each policy are summarised as follows:

CS7 (Urban Extensions)

- The policy is ambiguous in the approach to comprehensive development;
- A comprehensive approach relies on cooperative working, potentially across a multitude of land ownerships, and the ratification of a comprehensive plan via Planning Committee;
- These approaches have inherent problems in terms of delivery timescales and raise question marks over the plans ability to meet the housing strategy; and
- The list of requirements based on the broad locations for growth are not clearly defined and appear to resist the consideration of schemes individually. This is not an effective basis for the determination of planning applications.

CS8 (Wisbech)

- There is no definitive justification for the level of development (750 dwellings) identified for the broad location of growth and this undermines the case for the scale of transport infrastructure identified;
- The scale of infrastructure works set out in the policy are likely to have a significant impact on the viability and deliverability of development proposals coming forward; and
- We do not agree that development proposals should be required to achieve a modal shift to sustainable transport for existing communities. It is questionable how this approach could be reasonably delivered by individual development proposals in any case.

5.1.2 In this context, the CCfE are proposing detailed consideration be given to the identification of their landholding at Harecroft Farm "the Site" as a strategic allocation in Policy CS8.



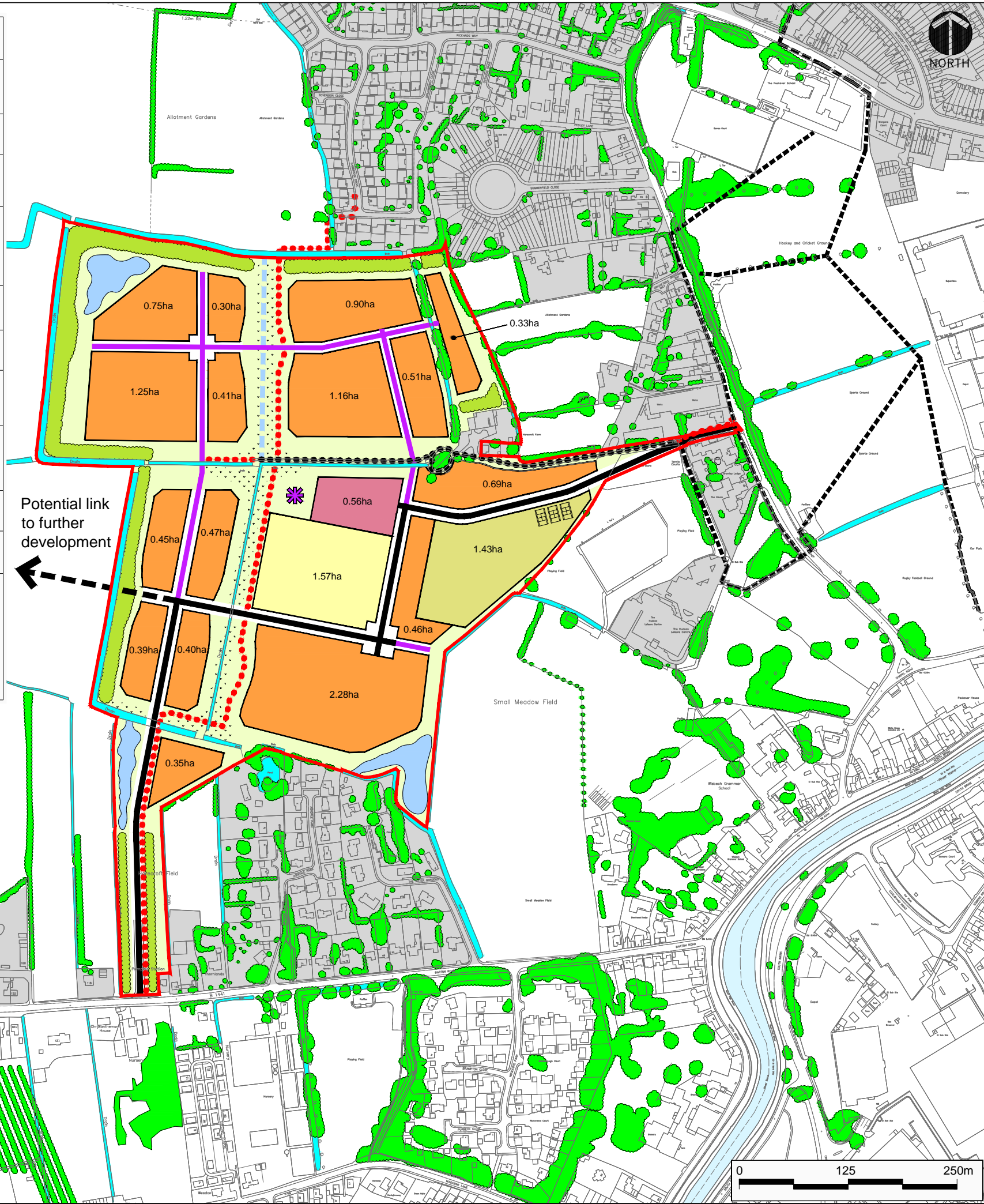
- 5.1.3 The Site makes up a considerable area of the West Wisbech BLG (30ha) and is considered suitable, available and deliverable in its own right. The Site is well related to the western side of Wisbech and would create a well defined edge to the settlement with the potential to link to future growth to the west.
- 5.1.4 There are no apparent constraints to the suitability of the Site for housing. The transport TN has demonstrated that the quantum of development proposed on the concept plan can be delivered without a requirement for significant highway infrastructure.
- 5.1.5 The Flood Risk TN confirms that the development of a strategic allocation on the Site is viable in terms of flood risk. The risk associated with the River Nene floodplain is mitigated as a result of off-site flood defence enhancements. Other potential on-site flood risks can be managed within the site through the use of a range of appropriate industry standard practices.
- 5.1.6 Given the single ownership, the absence of any particular site constraints, the general suitability of the Site and the evident need for requirement for local housing in Wisbech, the Site is considered suitable, available and deliverable and should be considered favourably as a strategic allocation.



Appendix 1 – Figure 1

DEVELOPMENT SCHEDULE	
Land Use	Net Area* (ha)
Residential	11.00**
Primary School (Reserve site)	1.57***
Local Facilities (Retail/business/community uses)	0.56
Sports Pitches	1.55
Proposed Open Space	10.50
SUDS/Existing Drainage Ditches	1.50
Neighbourhood Spine Road/Local Streets etc.	3.30
Existing Properties	0.22
Total Site Area	30.20

*Definition of net area (residential) taken from PPS3
 **11ha of residential land at an average density of 35 dph will provide 385 dwellings
 ***A further 55 dwellings could be accommodated on the school site



- Site Boundary (30.2ha)
- Residential
- Primary School (Reserve site)
- Local Facilities
- Play Area
- Neighbourhood Spine Road
- Local Streets
- Existing Track
- Existing Right of Way
- Proposed Footpath/Cycleway
- Existing Woodland and Hedgerows
- Proposed Planting
- Proposed Open Space
- Existing Drainage Ditches
- Proposed Swales
- Proposed Balancing Ponds
- Proposed Wetland Habitats
- Sports Pitches
- Existing Properties

Land at Harecroft Farm, Wisbech
Concept Masterplan

Scale 1:5000 at A3
 November 2013



This map is reproduced from OS material with the permission of OS on behalf of the Controller of HM Stationery Office ©. Unauthorised reproduction infringes Crown Copyright and may lead to prosecution. Church Commissioners. Licence Number 100002215. (2007)