

## **Draft Policy - Wisbech Fringes (inc. Walsoken)**

**Link to draft policy and comments in full received from the draft consultation stage:**

<https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1545131247420#section-s1545131247420>

### **Consideration of issues:**

The main issues raised by consultees were:

- Additional areas to be included in the Walsoken development boundary;
- Clarification of the application of the development boundary;
- A suggestion of an allocation for an additional 450 houses at Black Bear Lane;
- A suggestion of an allocation for an additional 14 houses at Burrett Road;
- A suggestion of an allocation for an additional 16 houses at Burrettgate Road;
- Minor rewording re flood risk;
- A suggestion of an allocation for an additional 16 houses at Sparrowgate Road;
- A suggestion of an allocation for an employment/mixed use (H497) in the vicinity of Wisbech Port;
- Need to work with QE Hospital and West Norfolk CCG re hospital impacts;
- Suggested amended wording re the delivery of the Broad End Road new/upgraded junction and specify that this should be in the form of a roundabout as specified in the Wisbech Access Study;
- A suggestion of an 8.5 ha (6.3 ha net) extension to the East Wisbech allocation for around 170 houses;
- A suggestion that land at Elm High Road should be allocated for mixed use to include 200 houses and retail/business land;
- Some suggestions for changes to the Policy wording from Fenland Council to reflect the BCP more closely;
- Additional text to protect the heritage asset north west of the site.



The resulting changes recommended to the policy and supporting text are set out below.

**Officer Recommendations to Task Group:**

The Task Group is recommended to:

**1) .**

- 6. Amend the wording of Policy F3.1 to refer to the agreement between FDC and BCKLWN on affordable housing provision (23%) – point 2j;**
- 7. Amend the wording of Policy F3.1 to make it clear that CIL is not required for developments on sites within the BCKLWN BCP area but that S106 is to be the main vehicle for attracting the necessary infrastructure for this site;**
- 8. Amend the wording of Policy F3.1 to emphasise that in bringing the site forward through planning applications there will need to be significant and early on-going co-operation between the two councils;**
- 9. Include an additional criterion in Policy F3.1 to require that development should preserve the listed building and its setting.**



## Policy Recommendation:

### Site Allocation

#### Policy F3.1 Wisbech Fringe - Land east of Wisbech (west of Burrettgate Road)

**Land to the east of Wisbech (approximately 25.3 hectares), as shown on the Policies Map, is allocated for 550 dwellings**

Development will be subject to:

1. Prior to the submission of a detailed planning application, the applicant should provide:
  - a. an ecological study that establishes either there would be no negative impact on flora and fauna; or if any negative impacts are identified, establishes that these could be suitably mitigated.
  - b. an archaeological assessment;
  - c. a landscape assessment to determine whether or not existing areas of mature orchards, could be retained and enhanced to serve as multi functional public open space areas with amenity and biodiversity value;
  - d. submission of a site specific Flood Risk Assessment, and accompanying topographical information, to be prepared in order to ensure that development is designed appropriately and built in those areas of the site least at risk of flooding;
  - e. **a drainage strategy for the whole site;**
  - f. a Broad Concept Plan (BCP) for the wider development area (including the adjacent Fenland allocations) showing how the various considerations and requirements (including those below) can be integrated and delivered. This has been agreed jointly by both Fenland District Council and the Borough Council. **In bringing the site forward through planning applications there will need to be significant and early on-going co-operation between the two councils.**
2. An application should show how it incorporates the provisions of the BCP into the application including the provision of:
  - g. the proposed access(es) to serve the development ensuring that there is no unacceptably net adverse impact on the local and strategic highway network and on existing residential amenity. Access towards the A47 will be via a new/upgraded junction, with the arrangements for delivering such upgrade being agreed as part of the comprehensive delivery scheme for the allocation. **This must include a new A47/Broadend Road Roundabout, as required by the Wisbech Access Study;**
  - h. local highway improvements to fully integrate the development into the surrounding network;
  - i. improved bus links to Wisbech town centre and associated infrastructure;
  - j. pedestrian and cycle ways within and beyond the site, including links to Wisbech town centre;
  - k. additional primary and secondary school places, including a new primary school on part of the jointly allocated area;

- l. strategic infrastructure for the wider area proportionate to the size of the development (CIL is not required for developments within the BCKLWN BCP area but S.106 is to be the main vehicle for providing the necessary infrastructure for the site);
- m. the provision of a site for a new local centre/community focus to serve the wider allocation, at the location determined in the BCP.
- n. protection and enhancement of public rights of way within the site;
- o. the preservation of the adjacent Grade II listed building and its setting (Austin House, 4 Burrett Gate Road, Walsoken) to the NE of the site;
- p. the provision of multi-functional open space throughout the site with open space standards jointly agreed with Fenland through the BCP process. Planning applications will need to be mindful of the wider open space requirements (including for SuDS) for the whole area as set out in the approved BCP (or any successor);
- q. sustainable drainage systems to address surface-water run-off, flood risk, biodiversity and the avoidance of groundwater pollution and a drainage strategy for the site;
- r. provision of affordable housing in line with the agreement between KLWN and FDC (23%) current standards;
- s. the provision of a site (either within KLWN or FDC allocations) for a new local centre/community focus to serve the wider allocation, at a location to be determined in the masterplan.

**Sustainability Appraisal:**

**Policy F3.1 Wisbech Fringe - Land east of Wisbech (west of Burrettgate Road)**

This policy is very similar, to the equivalent policy considered in the SADMP process and the sustainability appraisal of that. The proposed policy was assessed as having a positive effect.

Policy F3.1 Wisbech Fringe – Land East of Wisbech (west of Burrettgate Road)																							
Policy	SA Objective:																				Overall Effect		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20		+	-
F3.1	0	0	0	0	0	0	0	+	0	0	0	+	0	++	++	0	0	+	0	0	+7	0	Likely Positive Effect +7
Draft 3.1	0	0	0	0	0	0	0	+	0	0	0	+	0	++	++	0	0	+	0	0	+7	0	Likely Positive Effect +7
No Policy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Likely Neutral Effect

**Appendix 1: Summary of Comments & Suggested Response:**

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
Maxey Grounds & Co	<b>Object</b>	<p>The paragraph deals with the area of Walsoken identified within the development boundary.</p> <p>There are significant areas on the east side of Burretgate Road, and the north and south sides of Broadend Road where there is concentrated development, including commercial areas in active use, where it is considered that these whilst being separated from the main core of the village, should also be identified as being within the development area. They will be linked to the main part of the village by the urban extension. There are one or two minor infill sites within the developed footprint that could appropriately come forward to round off the area, but which at present would not come within policy LP26 because they do not adjoin the development boundary.</p>	<p>Include in the development boundaries the areas marked in blue on the attached plan.</p>	<p><b>Disagree</b> – it is not considered appropriate to include these areas as they currently detached from the built parts of the settlement.</p>
Nathan Rose	<b>Object</b>	<p>I've sought to understand the points made throughout this Local Plan Review, but it is very involved and complex for public consumption, in my view. It's hard therefore to be confident that the interests of local residents and the general public are catered for in at least equal measure with the views of developers who are naturally seeking to maximise revenue and profit, as business does. I hope part of the role of local planning is to balance these requirements.</p> <p>Can you help me with this by way of a specific example? The development boundary along Black Bear Lane and Burrett Road seems very clear. However, if applications were made for residential developments in the land north of Black Bear Lane (site refs 408/271 in previous documents) or east of Burrett Road (site</p>	<p>Changes needed as I have suggested elsewhere to improve confidence for residents and the public in the meaning, strength and value of development boundaries and associated planning policies.</p>	<p><b>Disagree</b> – these would be matters to be judged against the policy should applications come forward for consideration.</p>

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		<p>refs 406/272 in previous documents) or north-east of the crossroads, would these be turned down under this Local Plan Review on the basis of a) they are outside the development boundary as per Policy LP04 b) they would obscure the "views in/out of the locality" therefore contravene point 1d of Policy LP26?</p>		
Peter Humphrey	<b>Object</b>	<p>My client is generally supportive of the development strategy for Walsoken reflecting the strong range of local services and facilities within the village and its proximity to Wisbech, enabling new development to come forward in a sustainable manner.</p> <p>We do object to the line of the development boundary as it relates to and excludes land to the east of Black Bear Lane and request that it is amended to incorporate land identified on the attached map as a housing allocation as set out in the HELAA H453.</p> <p>The site is available and deliverable and in accordance it the search criteria set out in the HELAA and as such it becomes a judgement in relation to wider suitability and delivery aims; it is considered that this it is suitable and available for allocation.</p> <p>The site is well related to the town of Wisbech and to the allocated Wisbech East BCP area which is progressing towards submission of a planning application this year. The site's relationship to Wisbech makes it one of the most sustainable and accessible locations in the district.</p> <p>It is noted that the HELAA assessment identified no fundamental constraints to development and concluded that 'Based on current evidence the site appears suitable.' It is of course accepted that the site is large and it is not necessary for all of the potential 450 homes (that the site could accommodate) to come forward at this time, however given the duration of the local plan period it is clear that there will be a need for significant growth within Kings Lynn</p>	<p>Amend the development boundary of Walsoken to incorporate land at Black Bear Lane (HELAA 453) as a housing allocation for up to 450 homes over the plan period.</p>	<p><b>Disagree</b> – there is no need for further allocations to be made in the plan review period.</p>



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		<p>and West Norfolk and that the proximity to Wisbech makes this location highly sustainable.</p> <p>This being the case it is clear that the site can come forward within the plan period without harm to local amenity or strategic planning aims. The site could come forward as a whole later in the plan period, or it could be allocated in phases – coordinated by a masterplan. It is clear that the site relates well to the north eastern side of Wisbech and has good access to the A47 and Lynn Road.</p> <p>‘Overall the HELAA concluded that there were no overriding issues with the site that could not be mitigated and as such it is considered that it is clearly a suitable and available site within the village and it is considered having regard to the character of the area that the site could deliver up to 450 homes over the plan period.</p>		
Peter Humphrey	<b>Object</b>	<p>My client is generally supportive of the development strategy for Walsoken reflecting the strong range of local services and facilities within the village and its proximity to Wisbech, enabling new development to come forward in a sustainable manner</p> <p>We do object to the line of the development boundary as it relates to and excludes land to the east of Burrett Road and request that it is amended to incorporate land identified on the attached map as a housing allocation as set out in the HELAA H452.</p> <p>The site is available and deliverable and in accordance it the search criteria set out in the HELAA and as such it becomes a judgement in relation to wider suitability and delivery aims; it is considered that this it is suitable and available for allocation.</p> <p>The site is well related to the town of Wisbech and to the allocated Wisbech East BCP area which is progressing towards submission of a planning application this year.</p> <p>The site’s relationship to Wisbech makes it one of the most</p>	Amend the development boundary of Walsoken to incorporate land at Burrett Road (HELAA 452) as a housing allocation for up to 14 homes.	<b>Disagree</b> – there is no need for further allocations to be made in the plan review period.

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		<p>sustainable and accessible locations in the district.</p> <p>It is noted that the HELAA assessment identified no fundamental constraints to development and concluded that 'Based on current evidence the site appears suitable.'</p> <p>The site is available and deliverable and in accordance it the search criteria set out in the HELAA and as such it becomes a judgement in relation to wider suitability and delivery aims; it is considered that this it is suitable and available for allocation.</p> <p>The site is well related to the town of Wisbech and to the allocated Wisbech East BCP are which is progressing towards submission of a planning application this year.</p> <p>Given the extent to the land identified as part of the Wisbech East development in both King's Lynn and West Norfolk and Fenland it seems unnecessary to draw the development boundary so close in to Walsoken to prevent and additional development adjacent to the allocation; clearly the character of the area will change (to become more urbanised) and enhanced access and services will be introduced as part of the BCP area. This being the case it is clear that the site can come forward within the plan period without harm to local amenity or strategic planning aims.</p> <p>Overall the HELAA concluded that there were no overriding issues with the site that could not be mitigated and as such it is considered that it is clearly a suitable and available site within the village and close to the main bus route to Wisbech which will go through the BCP area it is considered having regard to the character of the area that the site could deliver up to 14 homes.</p>		
Peter Humphrey	<b>Object</b>	<p>Strong range of local services and facilities within the village and its proximity to Wisbech, enabling new development to come forward.</p> <p>We do object to the line of the development boundary as it relates</p>	Amend the development boundary of Walsoken to incorporate land east of	<b>Disagree</b> – there is no need for further allocations to be made in the plan review period.

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		<p>to and excludes land to the east of Burretgate Road and request that it is amended to incorporate land identified on the attached map as a housing allocation as set out in the HELAA H451.</p> <p>The site is available and deliverable and in accordance it the search criteria set out in the HELAA and as such it becomes a judgement in relation to wider suitability and delivery aims; it is considered that this it is suitable and available for allocation.</p> <p>The site is well related to the town of Wisbech and to the allocated Wisbech East BCP are which is progressing towards submission of a planning application this year.</p> <p>Given the extent to the land identified as part of the Wisbech East development in both King’s Lynn and West Norfolk and Fenland it seems unnecessary to draw the development boundary so close in to Walsoken to prevent and additional development adjacent to the allocation; clearly the character of the area will change (to become more urbanised) and enhanced access and services will be introduced as part of the BCP area. This being the case it is clear that the site can come forward within the plan period without harm to local amenity or strategic planning aims.</p> <p>Overall the HELAA concluded that there were no overriding issues with the site that could not be mitigated and as such it is considered that it is clearly a suitable and available site within the village and close to the main bus route to Wisbech which will go through the BCP area it is considered having regard to the character of the area that the site could deliver up to 16 homes.</p>	<p>Burretgate Road (HELAA 451) as a housing allocation for up to 16 homes.</p>	
Environment Agency	<b>Object</b>	<p>10.5.7 - ...the village is constrained and this is in the low to medium risk (category 2). Wording should refer to Flood Zones throughout for consistency and clarity.</p>	<p>Reword to: Only a small part of the built area of the village is constrained by flood</p>	<p><b>Agree</b> - amend wording of 10.5.7 as suggested.</p>

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			risk, with this are being at medium risk of flooding (Flood Zone 2).	
Peter Humphrey	<b>Object</b>	<p>My client is generally supportive of the development strategy for Walsoken reflecting the strong range of local services and facilities within the village and its proximity to Wisbech, enabling new development to come forward. We do object to the line of the development boundary as it relates to and excludes land to the east of Sparrowgate Road and request that it is amended to incorporate land identified on the attached map as a housing allocation as set out in the HELAA H451.</p> <p>The site is available and deliverable and in accordance it the search criteria set out in the HELAA and as such it becomes a judgement in relation to wider suitability and delivery aims; it is considered that this it is suitable and available for allocation.</p> <p>The site is well related to the town of Wisbech and to the allocated Wisbech East BCP area which is progressing towards submission of a planning application this year. Given the extent to the land identified as part of the Wisbech East development in both Kings Lynn and West Norfolk and Fenland it seems unnecessary to draw the development boundary so close in to Walsoken to prevent and additional development adjacent to the allocation; clearly the character of the area will change (to become more urbanised) and enhanced access and services will be introduced as part of the BCP area. This being the case it is clear that the site can come forward within the plan period without harm to local amenity or strategic planning aims.</p> <p>Overall the HELAA concluded that there were no overriding issues with the site that could not be mitigated and as such it is considered that it is clearly a suitable and available site within the village and close to the main bus route to Wisbech which will go through the BCP area it is considered having regard to the character of the area that the site could deliver up to 16 homes.</p>	Amend the development boundary of Walsoken to incorporate land east of Sparrowgate Road (HELAA 451) as a housing allocation for up to 16 homes.	<b>Disagree</b> – there is no need for further allocations to be made in the plan review period.
Mr Kooreman (Peter Humphrey)	<b>Object</b>	The employment strategy as explained in the Employment Land Review 2017 acknowledges that land allocation in the previous plan has not come forward at the rate expected - as set out below. Page 11-	Amend development boundary for Wisbech fringe to include all or part of the site	<b>Disagree</b> – there is no need for further allocations to be made in the plan review period.

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		<p>Therefore, of 68.5 ha, currently just 1.8 ha have been completed, 28 ha have planning permission and 39.2 ha do not have permission yet. In comparison to completions of the previous years, the current available employment land within the SADMP allocations present a supply of employment land for 19.6 years. Whilst there is a theoretical supply of employment land it may well be the case that this is not being taken up through being in the wrong location for business or that it is constrained in other ways. It is noted that notwithstanding Wisbech being a significant town for the southern part of West Norfolk providing many services and facilities -as well as employment opportunities – there are no employment allocations made adjacent to the town within KLWN BC. This is not considered to be balanced planning given the clear sustainability benefits that Wisbech has as an employment location.</p> <p>The land being promoted all (or part) of H497 is available for employment or mixed-use development within the plan period and offers the only large scale opportunity to expand Wisbech port which could offer significant employment and economic opportunities for the area within the plan period.</p> <p>It may be the case that the expansion does not require all of the land and my client is happy to discuss the level of need with officers within the plan preparation process.</p> <p>It is acknowledged that this is a longer-term option however it is the only land that could accommodate an expansion and given the plan period this could come forward in the latter stages of the plan.</p> <p>It is noted that H497 was rejected from the HELAA assessment because it was more than 25m from the development boundary and as such was not properly considered within HELAA or the site</p>	<p>identified in the HELAA as H497 as being suitable for employment land and as an extension to Wisbech port.</p>	

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		assessment sustainability assessment. It is considered that such a significant strategic site should be reconsidered within the plan preparation process to ensure that the council has fully acknowledged the unique opportunities that this large employment site adjacent to the river can bring.		
STP Estates Group	<b>Comment</b>	10.5.1 Under the East Wisbech Broad Concept Plan (2018) Community Facilities there is a comment that an expansion of health facilities will be required, especially when the total scale of development in Wisbech is taken into account. The majority of health facilities in Wisbech are covered by Cambridgeshire and Peterborough STP and therefore the Norfolk and Waveney STP estates group is unable to comment on these. However the Queen Elizabeth Hospital King's Lynn covers the Wisbech area and the impact on the hospital from significant large scale growth in Wisbech would be considerable. The Borough Council would therefore need to work with the Queen Elizabeth Hospital King's Lynn and West Norfolk Clinical Commissioning Group as the Wisbech project gathers pace to ensure that any available mitigation is sought from developers but also to ensure that the hospital is given the time required to respond to an increase in the population it serves.		Noted.
Nathan Rose	<b>Object</b>	Whilst it is good to see that the improvements to Broad End road / A47 junction are a requirement of the development of the site, I would like to see these requirements made more clearly and strongly even at this early stage. When the site that my home is part of was developed here in Walsoken, the developer was allowed to move on to new developments before meeting the planning requirements of this site. I don't blame the developer for doing this; developers are running businesses, not setting policy. However I feel the planning committee should have been stronger	Change this phrase "Access towards the A47 will be via a new/upgraded junction, with the arrangements for delivering such upgrade being agreed as part of the comprehensive delivery	<b>Disagree</b> – it would be inappropriate to include this form of restrictive wording in the policy as the junction can only be provided by a third party and is not in the control of the developer.

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		<p>in ensuring the requirements were met in an appropriate timescale rather than the drawn-out process which meant the roadways were not completed until months/years after they should have been. With 550 homes going into Walsoken, it would be seriously detrimental to the village, and road safety, if developers are allowed to commit to improving the junction, but then it becomes something that gets done well after the majority or all of the homes have been developed and inhabited. I appreciate a developer may argue that they need the revenue stream from sales of the homes to fund the road improvements, but this should not be acceptable if there is any way it would mean massively increased traffic through the junction, even for a few months, before the improvements are in place.</p>	<p>scheme for the allocation;" to something like "Access towards the A47 will be via a new/upgraded junction, with the arrangements for delivering such upgrade being agreed as part of the comprehensive delivery scheme for the allocation. It will be mandated that the new/upgraded junction is to be completed before commencement of development of the homes / before 25% / 50% / 75% of the homes are inhabited."</p>	
Nathan Rose	<b>Object</b>	<p>Section 10.5.1.20 under "Wisbech Access Study" specifically states that the improved junction at the Broadend Road / A47 junction will be "a new A47/Broadend Road Roundabout" and that this is part of "The short term package, for construction by Spring 2021". I'm aware, from a public meeting I attended a few years back at Walsoken Village Hall, that a new roundabout may be the most complex and costly improvement option from an engineering perspective. The content about this junction in Policy F3.1 is much less specific.</p>	<p>Change 2a in Policy F3.1 to be consistent with Section 10.5.1.20, as follows: "the proposed access(es) to serve the development ensuring that there is no unacceptably net adverse impact on the</p>	<p><b>Agree</b> – make reference to the roundabout in the policy.</p>

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		<p>Shouldn't it be consistent with the statements above? As it stands, it appears to allow for suggestions of alternatives to a new roundabout, perhaps cheaper and therefore less safe, and that the timescale is to be decided with developers.</p> <p>I've suggested new wording to cover this.</p> <p>Alternatively, if I have misunderstood the statement at 10.5.1.20, then this needs to be clearer. I can't offer alternative wording if this is the change required, as by definition I'm not sure what else it is trying to say.</p>	<p>local and strategic highway network and on existing residential amenity. Access towards the A47 will be via a new/upgraded junction, with the arrangements for delivering such upgrade being agreed as part of the comprehensive delivery scheme for the allocation. This must include a new A47/Broadend Road Roundabout, as required by the Wisbech Access Study, for construction by Spring 2021;"</p>	
Peter Humphrey	<b>Object</b>	<p>The Wisbech East sustainable urban expansion is a large allocation on the east of the town of Wisbech. It crosses the border between Norfolk and Cambridgeshire and incorporates housing allocations within the existing local plans for both King's Lynn and West Norfolk and Fenland councils.</p> <p>In 2018 the Broad Concept Plan (BCP) was approved / adopted by both councils and in January 2019 the EIA scoping opinion was submitted to the council for consideration. Land assembly is ongoing with the respective landowners and it is intended to work towards the submission of an outline planning application for the</p>	<p>Amend the housing allocations for Wisbech Fringe to incorporate the land in H099 (as illustrated on the attached plans) as an extension to the adopted BCP with an anticipated commencement in</p>	<p><b>Disagree</b> – there is no need for further allocations to be made in the plan review period.</p>



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		<p>entire BCP during 2019.</p> <p>The BCP incorporates an illustrative concept plan showing the relative positions of the land uses and possible transportation linkages though the site.</p> <p>My client owns part of the BPC area to the south of the old railway line and to the west of Meadowgate School and this is land (which lies within Fenland) is being promoted with in the BCP and forthcoming outline submission. Edged blue on the attached plan.</p> <p>In addition to the above plan my client also owns land edged on the plan (which does lie within KLWN), which is previously developed land formerly part of the College of West Anglia. In total the site is 8.3 ha in size however there are areas of woodland within it that would reduce the net developable area to approx. 6.3 ha.</p> <p>The site could also offer additional screening to the south of the BCP area from the A47.</p> <p>The site was put forward as part of the HELAA (ref H099), it is noted that it scored highly in terms of sustainability and deliverability, but was rejected on the advice of NCC highways concerns that a suitable highway access is not available. Now that it can be clarified how that access can be provided it is requested that the site be incorporated as an addition to the BCP which is acknowledged in both the KLWN and Fenland local plans as being a highly sustainable and accessible location for new growth and as previously developed land there is additional emphasis is securing best use.</p> <p>The HELAA confirms that there are no other material impediments to the sites development and as such it represents a logical and sustainable addition to the BCP.</p> <p>The landowner has an agreement with the promoter of the BCP</p>	<p>approx. 10 years which should be reflected in the accompanying policy and trajectory.</p>	

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		<p>that an access can be made available from the southern part of the BCP, through or around the poplar woodland to the site. Modelling for capacities in the forthcoming BCP outline submission will take the potential additional capacities from the site into account. See BCP plan with indicative road links through to the site, utilising a natural edge to the poplar woodland with the scrub beyond and looping around the woodland adjacent to Meadowgate Lane. Clearly this is contingent upon the BCP achieving the necessary planning permission and implementation for the roads and infrastructure to access and service the site – however given the length of the plan period (up to 2036) it should be included as an allocation albeit one that is not expected to come forward in the next 10 years as it will take several years to secure permission, undertake the infrastructure works and build out the BCP to a point where the necessary highway links are in place. Using the site area to density calculator formula as set out in the HELAA an indicative no of 170 homes is achievable from the site.</p>		
Environment Agency	<b>Object</b>	Map included is of poor resolution so it is not possible to determine location/layout of the site.	Provide an additional map with clearer resolution.	<b>Agree</b> – include improved map at next stage.
Mr Goodale (Peter Humphrey)	<b>Object</b>	<p>My client is generally supportive of the development strategy for Walsoken reflecting the strong range of local services and facilities within the village and its proximity to Wisbech, enabling new development to come forward in a sustainable manner. We do object to the line of the development boundary as it relates to and excludes land to the east of Black Bear Lane Road and request that it is amended to incorporate land identified on the attached map as a housing allocation as set out in the HELAA H453. The site is available and deliverable and in accordance it the search criteria set out in the HELAA and as such it becomes a judgement</p>	Amend the development boundary of Walsoken to incorporate land at Black Bear Lane (HELAA 453) as a housing allocation for up to 450 homes over the plan period.	<b>Disagree</b> – there is no need for further allocations to be made in the plan review period.

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		<p>in relation to wider suitability and delivery aims; it is considered that this it is suitable and available for allocation.</p> <p>The site is well related to the town of Wisbech and to the allocated Wisbech East BCP area which is progressing towards submission of a planning application this year.</p> <p>The site's relationship to Wisbech makes it one of the most sustainable and accessible locations in the district. It is noted that the HELAA assessment identified no fundamental constraints to development and concluded that 'Based on current evidence the site appears suitable.'</p> <p>It is of course accepted that the site is large and it is not necessary for all of the potential 450 homes (that the site could accommodate) to come forward at this time, however given the duration of the local plan period it is clear that there will be a need for significant growth within Kings Lynn and West Norfolk and that the proximity to Wisbech makes this location highly sustainable. This being the case it is clear that the site can come forward within the plan period without harm to local amenity or strategic planning aims.</p> <p>The site could come forward as a whole later in the plan period, or it could be allocated in phases – coordinated by a masterplan. It is clear that the site relates well to the north eastern side of Wisbech and has good access to the A47 and Lynn Road.</p> <p>'Overall the HELAA concluded that there were no overriding issues with the site that could not be mitigated and as such it is considered that it is clearly a suitable and available site within the village and it is considered having regard to the character of the area that the site could deliver up to 450 homes over the plan period.</p>		
Mr Goodale (Peter)	<b>Object</b>	My client is supportive of the general approach to allocation on	Amend the	<b>Disagree</b> – there is no need

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Humphrey)		<p>housing in Walsoken - acknowledging its sustainability and accessibility in relation to Wisbech which is a main town (albeit not in KLWN) which offers a significant range of higher order services and facilities.</p> <p>It is noted that the site is adjacent to the allocation of up to 1730 Homes on land within what is referred to as the Wisbech East Broad Concept Plan Area (BCP) the KLWN part of which remains an allocation under F3.1.</p> <p>This area is clearly regarded as being sustainable and accessible in planning terms.</p> <p>The BCP area planning is gathering pace with the BCP itself being adopted by both Kings Lynn and West Norfolk Council and Fenland District Council last year, and land assembly is on-going and the EIA scoping opinion was submitted to the councils in January 2019. It is anticipated that a planning application will be lodged within 2019.</p> <p>It is noted that the HELAA (H451) rejected the site only in relation to local highway network capacity. It is clear that in association with the BCP this will be significantly improved such that the allocation of the above site for upto 16 homes would be able to be accommodated in highway terms (it being approx. 1% of the allocation No). It is not considered that the density calculation in the HELAA is realistic and the development form as proposed in 16/00179/OM is more in keeping with a softer edge to the settlement.</p> <p>A planning application 16/00179/OM was refused in 2016 solely on rural protection grounds i.e. development the open countryside – the being no material constraints to the development of the site other than the its position outside of the development boundary.</p> <p>Given the impending development of the BCP area and the change in the character of the site at that point it is requested that the site</p>	<p>development boundary for Walsoken to incorporate the site (H451) and make an allocation to come forward in the 5-10 year timeframe within the plan.</p>	<p>for further allocations to be made in the plan review period.</p>

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		<p>be incorporated into the development boundary and that it be allocated.</p> <p>It is accepted that this is not immediately available for development (as it is reliant on the initial highway infrastructure for the BCP) however it is likely to come forward in the 5-10 year time slot once the main highways are in.</p> <p>Given that the plan has a timeframe of up to 2036 it is considered appropriate to make provision for sites not immediately available provided that they have a reasonable prospect of coming forward - this clearly does have a good prospect.</p>		
Elmside	<b>Object</b>	<p>Policy F3.1 allocates land for 550 dwellings (25.3 hectares) as shown on the Policies Map subject to a number of identified constraints. Part of the site has the benefit of a planning permission for 117 dwellings, planning reference 14/01714/OM dated the 4th March 2016 where it is considered that, in any event, the settlement boundary should be amended to include the consented site area within the urban area.</p> <p>2 ALTERNATIVE SITES (F3.1)</p> <p>2.1 In terms of land at Elm High Road, it is considered this should be included in the Local Plan as a mixed use allocation to potentially extend the existing retail/business park on Elm High Road, the following are relevant:</p> <ul style="list-style-type: none"> <li>☑ The site is available and is under the control of one party.</li> <li>☑ The site has developer interest meeting the requirements of the Framework.</li> <li>☑ There are not any technical reasons why this site should not be deliverable (highways, drainage, ecology etc).</li> <li>☑ The site will be relatively easy to develop in comparison to other sites, ie. proposed allocation F3.1 which is totally dependent upon other development being implemented by the eastern expansion</li> </ul>	<p>It is considered by Elmside for the reasons outlined by this statement and previous submissions that the land at Elm High Road for a mixed use allocation to include 200 dwellings and retail/business land uses should be allocated in the Local Plan. The alternative sites such as F3.1 proposed by the Plan are not considered to be deliverable, certainly during the early part of the Plan or in terms of sustainability or</p>	<p><b>Disagree</b> – consented sites are not included within the development boundary until they are built. The existing allocation was established through the local plan process as the most sustainable option and a Broad Concept Plan (BCP) has been prepared jointly with Fenland Council to assist in bringing it forward.</p>

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		<p>of Wisbech.</p> <p>☐ The site benefits from good access to infrastructure and is a desirable location for development affording good access to transport links and other facilities. The site is being promoted for an allocation for up to 200 dwellings with the access to the site via Hunters Rowe.</p> <p>2.2 It is submitted that in summary form, the circumstances that justify the redrawing of the settlement boundary to enable mixed use development of some 200 dwellings and also retail/business to be further delivered at Elm High Road are as follows:</p> <p>1) The site, in part, has the benefit of a planning permission for 117 dwellings which, in any event, the settlement boundary should include the site.</p> <p>2) The most sustainable and deliverable direction of growth for an urban extension is to the south east</p> <p>3) The site is outside the flood plain.</p> <p>4) It is considered that the site enables the redefinition of the settlement boundary that will endure for the long term and create a new defensible boundary.</p> <p>5) The site is located on existing public transport routes and there remains the opportunity to enhance linkages which will further improve the sustainability credentials of the site.</p> <p>6) With the site, in part, having the benefit of a planning permission for 117 dwellings (for which reserved matters has been granted) the site is clearly a sustainable location for development. The further development can use the existing roads and services (to connect to) which contributes to sustainability.</p>	<p>constraints, preferable to Elm High Road in planning terms.</p>	
Elmside	<b>Object</b>	<p>11. With regard to Policy F3.1 – Wisbech Fringe, it is submitted that this allocation proposed essentially as an extension to the east Wisbech allocation (Fenland District Council for in the region of</p>		<p><b>Disagree</b> – the existing allocation was established through the local plan</p>

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		<p>1,000 homes), it is submitted that there are more sustainable alternatives with regard to addressing housing need in the Wisbech fringe.</p> <p>12. The proposals for the “Wisbech Garden Town” set out at paragraph 10.5.1.10 are supported and clearly further confirm the highly sustainable nature of the settlement, that policy F3.1 is clearly inadequate in identifying the needs of Wisbech.</p>		<p>process as the most sustainable option and a Broad Concept Plan (BCP) has been prepared jointly with Fenland Council to assist in bringing it forward.</p>
Fenland	<b>Object</b>	<p>FDC is also supportive of Policy F3.1 Wisbech Fringe - Land east of Wisbech (west of Burrettgate Road). The inclusion of the approved Main Diagram of the BCP is welcomed as well as supporting text in the policy to enable its delivery.</p>	<p>Whilst no objections are raised to the policy wording of F3.1 it may be helpful to consider the following:</p> <ul style="list-style-type: none"> <li>- Highlight that multi-functional open space is to be provided throughout the site with open space standards jointly agreed with Fenland through the BCP process. Planning applications will need to be mindful of the wider open space requirements (including for Suds) for the whole area as set out in the approved BCP (or any successor).</li> <li>- A drainage strategy for the whole site is also</li> </ul>	<p><b>Agree</b> – include these suggested changes to the policy wording to more closely reflect the Broad Concept Plan requirements.</p>

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			<p>key to bringing forward comprehensive development and could be highlighted in the policy (part of 2i?)</p> <ul style="list-style-type: none"> <li>- Similarly there was agreement between FDC and BCKLWN on affordable housing provision (23%) – point 2j could be made clearer.</li> <li>- It is also understood that CIL was not to be required for developments on sites within the BCKLWN BCP area but that S106 was to be the main vehicle for attracting the necessary infrastructure for this site.</li> <li>- In bringing the site forward through planning applications there will need to be significant and early on-going co-operation between the two councils and this point</li> </ul>	



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			could be emphasized. The supporting text referring to potential wider Wisbech proposals e.g. A47 upgrade, garden town, rail link etc. is also welcomed and as this is constantly evolving would need to be brought up-to-date in future versions of the plan.	
Historic England	<b>Object</b>	Object - Whilst there are no designated heritage assets within the site, there is a grade II listed building to the north west of the site. Development of this site has the potential to impact upon the setting of this listed building. There is currently no reference to this nearby heritage asset within the policy. We suggest that the policy is amended to include a criterion for the protection of the setting of the heritage asset.	Include an additional criterion to read, 'Development should preserve the listed building and its setting'.	<b>Agree</b> - amend the wording as suggested.