

KING'S LYNN AND WEST NORFOLK BOROUGH COUNCIL

LOCAL PLAN: SITE ALLOCATIONS AND DEVELOPMENT MANAGEMENT POLICIES

EXAMINATION

ISSUE 11 – WISBECH FRINGE (F.3)

Hearing Statement - Prepared by Cheffins on behalf of the College of West Anglia (in respect of Land East of Meadowgate Lane, Wisbech)

Inspector's Overarching Questions

Question 11.1: *Is there any evidence that the elements of the proposed development west of Burrowgate Lane (F3.1) are not justified, sustainable, viable, available or deliverable? If such evidence exists what alternatives area available and have they been satisfactorily considered by the Council?*

Question 11.2: *Is policy F3.1 compatible with any policy adopted by Fenland District Council for the land to the west (within Fenland District)?*

Background

Wisbech is the largest settlement in the Fenland District and has a significant range of services and facilities. It also serves the surrounding rural settlements, including those within West Norfolk on the east side of the town. However, the growth of Wisbech is constrained by highway and flood risk issues, which makes the area adjacent to the town on the east side (some of which is within the Borough of King's Lynn and West Norfolk), a very significant opportunity for sustainable growth. It therefore follows that all the most sustainable locations on the eastern fringe of the town should be considered and properly assessed.

The proposed site allocation (F3.1), within the Borough of King's Lynn and West Norfolk, immediately adjoins the eastern boundary of the adopted site allocation in Fenland District, since the boundary largely bisects the fields and countryside between the physical boundaries of Burrowgate Road and Stow Road, and Green Lane and Stow Lane. However, the land to the south of the Fenland District site allocation, which is also within the Borough of King's Lynn and West Norfolk, has been dismissed as a potential site allocation even though it is partly brownfield land (part of the College of West Anglia Isle Campus site east of Meadowgate Lane), and is situated in a more sustainable location closer to existing services and facilities within the town itself. This land also adjoins the Meadowgate School, which is situated to the north of the site.

There are a number of other reasons why we consider the land owned by the College of West Anglia to the east of Meadowgate Lane to be a sustainable location for residential development and that the site should also be included in the Borough Council's 'Wisbech Fringe' housing allocation. The locational and planning merits of the site are described in our 'Publication Stage Representation Form' submission.

Inspector's Question 11.1: *Is there any evidence that the elements of the proposed development west of Burrowgate Lane (F3.1) are not justified, sustainable, viable, available or deliverable? If such evidence exists what alternatives are available and have they been satisfactorily considered by the Council?*

Our representations question the deliverability of the proposed allocation (F3.1), because without the inclusion of our clients land at Meadowgate Lane, the access options available to serve the whole of the Wisbech Fringe allocations are more limited. The inclusion of our clients land would potentially allow for a new access via the land to the west of Meadowgate Lane from the A1101 (Elm High Road), through to the Wisbech Fringe allocations via the land to the east of Meadowgate Lane. Full details of these potential access proposals were submitted to the Council at the 'Issues and Options' stage of the Local Plan.

Modelling work and assessment is currently being undertaken by Cambridgeshire County Council as part of the 'Wisbech Access Study', to establish whether the existing highway network will be sufficient to cope with all the increased traffic arising from the 1,500 dwellings to be provided in East Wisbech. The study will also outline mitigation measures, such as junction improvements, which would be required to make the development acceptable in highway terms. While the Wisbech Access Study will not be completed until December 2015, we understand that preliminary findings are likely to be available before then. Clearly, this document will be a key report that will help to justify the deliverability of both allocations and, at this stage, it makes no sense in planning terms to exclude potential fringe sites that are sustainable and which could provide additional access options.

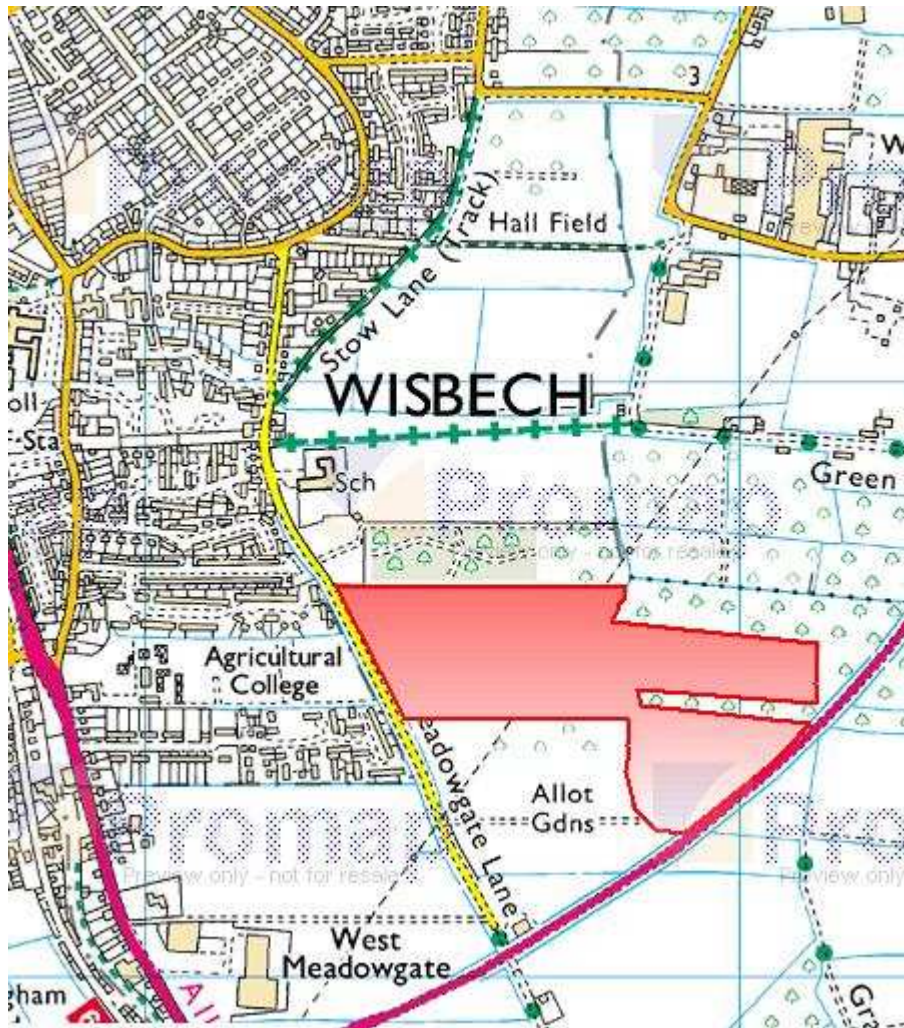
The allocation of the land east of Meadowgate Lane as an extension to the town within the KL&WNBC area would be a logical and environmentally sound approach, as well as one which will help to achieve the longer term aspirations of two local planning authorities and the community of Wisbech. This additional site would form a small and natural extension to the allocated area in the FDC Local Plan and would also allow greater opportunities for infrastructure such as open space, landscaping, habitat creation (or protection), schools or other community infrastructure, to be provided across the combined FDC/KL&WNBC site.

The site at Meadowgate Lane is in an equally sustainable location as the proposed site allocation. It also meets (and in some cases better) the requirements that the Council have used to justify the proposed site allocation – particularly in respect of access and deliverability - and the fact that the Meadowgate Lane site can be partly classified as a 'brownfield' site.

The Meadowgate Lane site also represents a more logical 'rounding off' of the settlement boundary for Wisbech when taken into consideration with the East Wisbech strategic site allocation by FDC.

Therefore, in order to make the Site Allocations and Development Management Policies document sound in terms of deliverability, we would recommend that the proposed site allocation F3.1 be extended to include our clients land to the east of Meadowgate Lane (immediately south of Meadowgate School). The inclusion of this land within the Wisbech Fringe allocation would clearly be a more appropriate and sustainable strategy, for the reasons given above. It would also allow for greater flexibility in the future provision of housing in this key location.

The inclusion of this land within the Wisbech Fringe allocation would also make the Plan more effective because it would recognise the importance of ensuring that the existing and new development proposed at Wisbech that falls within the Borough of KL&WN, will fully complement the development proposed for Wisbech in the Fenland Local Plan.



Boundary of Land at College of West Anglia, Meadowgate Lane East, Wisbech

Inspector's Question 11.2: *Is policy F3.1 compatible with any policy adopted by Fenland District Council for the land to the west (within Fenland District)?*

We are aware that Fenland District Council (FDC) originally submitted a holding objection to the Borough Council in respect of this policy, because they firmly believe that our clients land east of Meadowgate Lane should be included within the KL&WNBC allocation. FDC also see the inclusion of this land within the KL&WNBC allocation as a logical extension of their 'Wisbech Fringe' allocation and one that could provide an additional opportunity to access the Wisbech town highway network to cater for traffic from the estimated 1,500 dwellings in the combined allocated area. Although it is now understood that the FDC holding objection has been withdrawn, the FDC concerns about the exclusion of our client's site, and the loss of the potential access opportunities that could be provided, are believed to remain.

Policy LP8 of the FDC Adopted Local Plan identifies Wisbech as one of the main focuses for housing, employment and retail growth, and identifies East Wisbech as a strategic site allocation, primarily for housing. However, the policy also notes that the growth of Wisbech is constrained by the capacity of the local highway network and that the proposed access(es) to serve the development must ensure that there is no unacceptably net adverse impact on that network. Policy LP8 anticipates that around 900 dwellings should come forward in the Fenland

area, and 550 dwellings in the KL&WNBC area, with the final latter figure to be determined via the KL&WNBC Site Allocations and Development Management Policies Local Plan.

It is also significant that FDC acknowledge (at paragraphs 4.3.4 and 4.3.5) that development in East Wisbech will be dependent on the continuation of joint working with KL&WNBC, Cambridgeshire County Council and Norfolk County Council, and that there is a clear need to ensure that development proposed for Wisbech in the KL&WNBC Local Plan successfully complements development proposed at Wisbech that falls within the FDC area. The adopted FDC Local Plan states that the allocation will comprise the whole of the land to the east of Wisbech as identified on the Key Diagram and the Policies Map, **plus additional adjoining land to the east and/or south** of that land as falling within the KL&WNBC administrative area (our emphasis).

We believe that it is still very important to ensure an additional opportunity is provided to access the Wisbech town highway network to cater for the traffic from the estimated 1,500 dwellings in the combined allocated area. This would help to prevent an adverse impact on the amenity of existing residents by only utilising and potentially overloading existing residential streets which adjoin the East Wisbech area. We also consider that if our client's land is included within the proposed KL&WNBC East Wisbech allocation, that an access could be provided to link to the A1101 (Cromwell Road/Elm High Road) through the existing COWA site on Ramnoth Road, and thereby allow easy access to the remainder of the town.

In the light of all above, we can see no valid reason why our clients land should be excluded from the proposed allocation. As it is currently drafted, we do not believe that Policy F3.1 is compatible with Policy LP8 as set out in the FDC Core Strategy Local Plan document.

The wording of Policy F3.1 would only need to be changed to reflect the increase in total site area and the increase in the potential number of dwellings. The criteria contained in the policy are equally applicable to both sites.

The increase in housing numbers for the Wisbech Fringe created by the inclusion of the land east of Meadowgate Lane would also allow less sustainable housing locations (such as those in the rural villages) to be reviewed and reduced as necessary. This approach is fully supported by the presumption in favour of sustainable development set out in the NPPF.

The Wisbech Fringe site allocation is a key strategic development area for both the KL&WN Site Allocations Plan and the Fenland District Core Strategy. We do not believe that the Council has properly justified its reasons for excluding our client's land east of Meadowgate Lane from the proposed site allocation for the Wisbech Fringe, to the extent that the Site Allocations and Development Management Policies document is not sound for the reasons set out above.