
F/YR21/0852/O

**Applicant: Mr C McGill
WMS**

**Agent : Mr Gareth Edwards
Swann Edwards Architecture Limited**

**Fridaybridge Agricultural Camp, 173 March Road, Friday Bridge, Wisbech
Cambridgeshire PE14 0LR**

Erect up to 102 x dwellings, a community building/museum and sports changing facilities involving the demolition of existing buildings (outline application with all matters reserved)

Officer recommendation: Refuse

Reason for Committee: Number of representations contrary to officer recommendation

Government Planning Guarantee

Statutory Target Date For Determination: 19 October 2021

EOT in Place: Yes/No

EOT Expiry: 5 May 2025

Application Fee: £14192

Risk Statement: This application must be determined by 5th May 2025 otherwise it will be out of time and therefore negatively affect the performance figures.

1 EXECUTIVE SUMMARY

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| <p>1.1 The application seeks outline planning permission, with all matters reserved, for the erection of up to 102No. dwellings, a community building/museum and sports changing facilities, involving the demolition of existing buildings.</p> <p>1.2 The application site comprises a former Prisoner of War Camp, currently used as temporary accommodation for agricultural workers. The application is located within the countryside, approximately 0.8 metres from the edge of the continuous built settlement, and approximately 1.5 kilometres from the village centre, of Friday Bridge.</p> <p>1.3 The proposed development is contrary to relevant policies within the Fenland Local Plan 2014 in respect of the principle of development and its impacts on highway safety, the character and appearance of the area, heritage assets, residential amenity, biodiversity, affordable housing provision and infrastructure capacity.</p> <p>1.4 There are unresolved consultee objections from Cambridgeshire County Council's Transport Assessment Team, Fenland District Council's Conservation Officer, and the Wisbech Society.</p> |
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- 1.5 Financial contributions have been requested by the NHS Cambridgeshire & Peterborough Integrated Care System and the East of England Ambulance Service NHS Trust. However, the application is not accompanied by a Heads of Terms or any other form of agreement to provide the requested contributions.
- 1.6 Affordable housing provision has been requested by the Council's Housing Strategy team. However, the application is for 100% market housing and therefore does not propose any affordable housing provision.
- 1.7 The application is recommended for refusal.

2 SITE DESCRIPTION

- 2.1 The application site is a former purpose-built Prisoner of War (POW) Camp, which was used for Italian and German prisoners of war during, and immediately after, World War Two. The site contains a water tower, headquarters, accommodation blocks, ablution block, Nissen Hut and guard hut at the entrance, amongst other buildings. The Local Planning Authority consider the site to be a non-designated heritage asset.
- 2.2 The application site is currently used as temporary accommodation for agricultural workers, utilising the former POW buildings and more modern buildings.
- 2.3 The application site is located within the countryside; approximately 0.8 metres from the edge of the continuous built settlement, and approximately 1.5 kilometres from the village centre, of Friday Bridge. The application site is accessed off the east side of the B1101 (March Road). The application site is bordered by a substantial number of trees which are located along the boundaries of the site.
- 2.4 The application site is predominantly surrounded by agricultural fields, located to the north, east and south. There is a residential dwelling, a children's residential home, and a co-education day school located on the opposite side of the B1101 to the west of the application site; this includes a Grade II listed building, known as Waldersea House. There is a public footway opposite the application site, on the west side of the B1101. There are also bus stops located on the B1101, immediately to the west of the application site.

3 PROPOSAL

- 3.1 The application seeks outline planning permission, with all matters reserved, for the erection of up to 102No. dwellings, a community building/museum and sports changing facilities involving the demolition of existing buildings.
- 3.2 The application includes details of the following:
 - An indicative site layout, elevations and floor plans; indicatively showing 58No. dwellings, 44No. flats (comprised within three blocks), some existing buildings to be retained as a museum and community buildings, roads and footways, public open space and existing trees to be retained.
 - Indicative alterations to the site access showing a 6 metre wide access for the first 10 metres from the B1101 carriageway, with a 10 metre radii.

- A new dropped kerb crossing with tactile paving is proposed immediately to the west of the application site, to provide a crossing point to the existing public footway on the west side of the B1101.
- A new bus shelter, flag and posts with Real Time Passenger Information display, and raised kerbs is proposed immediately to the west of the application site, on the east side of the B1101.

3.3 The application is accompanied by the following key documents and plans:

- Location Plan
- Indicative Site Plan
- Indicative Floor Plans and Elevation Plans
- Design & Access Statement
- Flood Risk Assessment & Sustainable Drainage Strategy
- Arboricultural Impact Assessment
- Heritage Impact Statement
- Preliminary Ecological Appraisal
- Biodiversity Net Gain Report
- Biodiversity Net Gain Metric
- Phase 2 Bat Survey
- Transport Assessment and supplementary highways Information
- Topographical Surveys
- Air Impact Assessment
- Health Impact Assessment
- Phase I Geo-Environmental Desk Study

3.4 The proposed development (and subsequently the description of the proposed development) has been amended during the course of the application.

3.5 Full plans and associated documents for this application can be found at:

<https://www.publicaccess.fenland.gov.uk/publicaccess/>

4 SITE PLANNING HISTORY

F/YR02/1258/F - Continued use of land for the stationing of 6 no. mobile homes for staff accommodation - Granted 06.01.2003

F/YR01/0932/F - Use of land for the stationing of 6 no. mobile homes for staff accommodation - Granted 02.11.2001

F/YR00/0707/F - Variation of Condition 02 of planning permission F/99/0457/F (Erection of 2-storey building for the temporary accommodation of agricultural workers and 2 x 1-bed flats) to allow occupation of building all year round - Granted 25.10.2000

F/YR00/0706/F - Variation of Condition 02 of planning permission F/92/0796/F (Erection of a 2-storey building to form dormitory accommodation) to allow occupation of buildings all year round - Granted 25.10.2000

F/YR00/0705/F - Use of land for the stationing of 4 no. temporary buildings for student accommodation - Granted 25.10.2000

F/YR00/0704/F - Use of 4 no. buildings and stationing of 9 no. temporary buildings as a residential language school - Granted 25.10.2000

F/YR00/0703/F - Siting of 3 no. gas tanks - Granted 25.10.2000

F/YR00/0702/F - Use of land for the stationing of 6 no. mobile homes for staff accommodation - Granted 25.10.2000

F/YR00/0161/F - Removal of Condition 02 of planning permission F/92/0796/F (Erection of a 2-storey building to form dormitory accommodation) to allow occupation of the building all year round - Refused 13.04.2000

F/YR00/0137/F - Erection of a 2-storey building for the all year round accommodation of agricultural workers incorporating 2 x 1-bed flats - Refused 13.04.2000

F/99/0457/F - Erection of a 2-storey building for the temporary accommodation of agricultural workers and 2 x 1-bed flats - Granted 20.10.1999

F/93/0568/F - Erection of a shower/toilet block - Granted 25.11.1993

F/1266/88/O - Formation of an 18 hole golf course, erection of a club house, leisure facilities and 198 detached houses with associated roads and parking facilities (214 acres) - Refused 12.10.1989

F/0699/79/F - Siting of 50 touring caravans - Granted 16.11.1979

5 CONSULTATIONS

All consultation responses are summarised below:

5.1 Elm Parish Council – Most recent comments received 13.02.2025, which are further to previous comments

Strong objections.

Concerns and objections in connection to; location, infrastructure, highways issues, drainage/surface water management etc.

Information contained in earlier responses still stands.

Comments raised within previous responses

Strong objection.

- Would result in the creation of a remote, isolated community rather than an extension to the village of Friday Bridge.
- Access to the proposed site would be via the B1101; a rural road with a 60mph speed limit, regularly used by agricultural vehicles. A farm entrance lies opposite.
- The access is located on a straight stretch of the B1101 between the Jew House Drove and Coldham Hall Chase junctions, vehicles regularly travel at excess speed along this section of the highway and conditions are particularly hazardous when the A47 is closed resulting in a higher volume of traffic.
- There is no street lighting or reduced speed limit.
- Design proposals for the bellmouth access would make the junction virtually invisible to motorists approaching from either direction.
- Presently, people are transported via minibus to and from the site, the construction of 102 dwellings; with residents using their private vehicles; would hugely increase traffic movement at the site junction.
- Pedestrians (including unaccompanied children) would have to cross the [60mph] highway to access both the bus stop and pavement; which is extremely narrow to the point that it would not accommodate a parent and child walking side by side.
- Anglian Water has stated that there would be a chance of flooding downstream caused by the proposals and furthermore, there would be an impact on existing public sewers. Presently, during periods of heavy rainfall many watercourses are filled to capacity and surface ground water is unable to drain away. The Lead Local Flood Authority and Internal Drainage Boards need to be consulted concerning the drainage strategy to ensure that existing properties would not be at increased risk of flooding as a result of the proposals.
- The drainage system in Elm is full to capacity and cannot cope with additional volumes of water; this development would increase the risk of flooding downstream and impact the existing public sewer system.
- The proposals would impact on the provision of emergency medical treatment in the area as there is already a deficit of emergency ambulance services. Doctor, dentist and hospital services would also be impacted.

- The site is remote, public transport is extremely limited which would make it virtually impossible to access employment opportunities without the use of a private motor vehicle.
- The creation of 102 households would include a significant rise in the number of children requiring an education, thereby placing additional strain on existing schools and nurseries.
- Insufficient information has been submitted in order to ensure that all biodiversity material concerns have been addressed.
- There is evidence of protected species at the site which is a material planning consideration. Further surveys need to be completed in order to assess the ecological constraints present within the site's buildings and habitats.
- The location is totally unsuitable for such large-scale residential development. It is remote from Friday Bridge village and would result in the creation of a separate isolated community. Public transport is extremely limited and would not support accessibility for employment. The adjacent unlit rural road is also totally unsuitable for pedestrian safety and the number of vehicle movements which would result from such a development.
- Stress the historical importance of the site and request that organisations such as English Heritage are consulted concerning the proposals.
- Infrastructure services (doctors, dentists, police, schools, nurseries) are facing even more pressure than they were in 2021; there is no more capacity in the system to cope with the proposed development.
- The location is totally unsuitable for such large-scale residential development. It is remote from Friday Bridge village and would result in the creation of a separate isolated community.
- Public transport is extremely limited and would not support accessibility for employment.
- The adjacent unlit rural road is also totally unsuitable for pedestrian safety and the number of vehicle movements which would result from such a development.

5.2 East of England Ambulance Service NHS Trust (EEAST) - Comments received 17.04.2025

Requests a greater financial contribution than requested within their previous comments. The contribution required to create additional ambulance services to support the population arising from proposed development is now £33,354, to support provision of an additional ambulance to meet the expanded demand arising from the proposed development.

Comments raised within previous consultation response

The Health Impact Assessment accompanying the application is exceedingly limited.

Notes that the Health Impact Assessment accompanying the application states a detailed health impact assessment is not required.

Requests a detailed Health Impact Assessment is undertaken, as EEAST has significant concerns due to the following:

1. It is on a major road (B1101) with a national speed limit of 60 miles per hour vicinity of the site access, dropping to 40mph approximately 600m northwest of the site access before the sharp right-hand bend at the start of the approach into the main body of Friday Bridge. There are no plans to reduce the speed limit despite the expectation primary school children using the footpath to access the local primary school (expected walking time 22 minutes). Children (who could be unaccompanied) will also need to cross the road to access the site.
2. The existing footpath is of limited width (currently only single file) is prone to being overgrown. The Transport Assessment identifies a plan to extend to - 2m wide footway along the northern side of the access with a 2m wide dropped kerb with tactile paving crossing to the existing footway on the opposite side of March Road.
3. No street lighting is present and there are no plans to increase street lighting despite the expectation school children will use the footpath to access the local primary school (expected walking time 22 minutes).
4. There is a potential that school children may be driven to school due to the nature of the road and footpath which will increase the volume of traffic above that identified in the Transport Assessment.
5. Pedestrians will need to cross the road with no street lighting or reduced speed limit in order to access the bus stop and footpath.
6. No accident data for the last 3-5 years has been provided for the local area. Accident data should be obtained and reviewed.

Requests that the concerns raised above are carefully considered and addressed.

EEAST requires additional resources in order to maintain the Category response times, as the nature of this development is likely to increase the current demand for ambulance calls. The capital required to create additional ambulance services to support the population arising from the proposed development is calculated to be £8,867.

EEAST therefore requests that the sum of £8,867 be secured through a planning obligation linked to any grant of planning permission. This will contribute towards the development of capacity in emergency ambulance services for the benefit of patients in the vicinity of the application site.

The development would have an impact on healthcare provision in the area where there is already a deficit of emergency ambulance services. If unmitigated, the development would be unsustainable. Planning obligations could be used to secure contributions to mitigate these impacts and make an otherwise unacceptable development acceptable in relation to healthcare provision.

5.3 Cambridgeshire & Peterborough Clinical Commissioning Group – Most recent comments received 23rd August 2021, which are further to previous comments

The proposed development is likely to have an impact on the 3 x GP Practices operating within the vicinity of the application; North Brink Practice, Trinity Surgery and Clarkson Surgery. There is zero capacity in the Wisbech area to take on additional patients and this development of 102 dwellings would see an increase in patient pressure of circa 244 new residents, which would require additional workforce to support an increase in appointments and a resulting increase in estate demand.

Has received advice regarding the cost of a single-storey extension to an existing premises and refurbishment.

A developer contribution will therefore be required to mitigate the impacts of this proposal. The level of contributions required in this instance is calculated to be £87,691.56.

Payment should be made before development commences. Requests the sum is secured through a Section 106 Agreement, with the proposal that the sum be used to fund a project which increases clinical capacity at one of the GP Practices within the vicinity of the development, or any project at an alternative premises in the vicinity of the Practices/development which increases primary healthcare capacity.

The development will give rise to a need for additional primary healthcare provision arising from the development. The capital required through developer contribution would form a proportion of the required funding for the provision of capacity to absorb the patient growth generated by this development.

Assuming the above is considered in conjunction with the current application process, would not wish to raise an objection to the proposed development. Otherwise, the Local Planning Authority may wish to review the development's sustainability if such impacts are not satisfactorily mitigated.

Comments raised within previous consultation response

This development is fairly equidistant between the towns of March and Wisbech and therefore may affect Primary Care services in both towns. However, advises that there is currently capacity to mitigate this growth at both Trinity Surgery in Wisbech and also at the Riverside Surgery in March. Therefore, do not request a Section 106 developer contribution.

5.4 Cambridgeshire County Council Highways Development Management Team – Most recent comments received 16th April 2025, which are further to previous comments

Recommend refusal.

As per their previous response, the applicant has not demonstrated that safe and suitable pedestrian access can be provided to Friday Bridge; or that the bus stop mitigation works are feasible / deliverable within the extent of public highway. As such, it has not been demonstrated that the proposed development would not be prejudicial to the satisfactory functioning of the highway and highway safety.

Notes that Cambridgeshire County Council Transport Assessment Team are also recommending refusal on the basis that the proposed development is not sustainable and would lead to a car lead development.

Relevant comments raised within previous response

- The applicant states the site is 1.8km from Friday Bridge Primary school which is generally considered to be an acceptable walking distance. However, in this case, the walking route is via a narrow footway along a high-speed and unlit road (which will need to be crossed at least twice). This route provides poor pedestrian safeguarding and such a route is likely to be unattractive for walking by most users, particularly with young children or pushchairs.

Recommends that the applicant demonstrates that a continuous footway (including a safe crossing of Jew House Drove) of 2m can be accommodated between the development and the urban settlement / 30mph limit, as per DfT inclusivity guidance. A 1.5m reduction may be considered at localised constraints. Such a package of mitigation is required to make the development acceptable in highway safety terms.

- The applicant is proposing new bus shelters on March Road. While acceptable in principle, the applicant must first procure a copy of the verified highway boundary and overlay on the submission to ensure the works are feasible. They must also engage the Parish Council regarding ongoing maintenance responsibilities, as this will not sit with the Highway Authority. <https://www.cambridgeshire.gov.uk/business/highway-searches>
- The applicant must demonstrate 215m forward visibility to the proposed uncontrolled pedestrian crossing of March Road.

5.5 Cambridgeshire County Council Transport Assessment Team - Comments received 6th September 2021

Recommends refusal.

- The site is currently a residential site for 300 workers, with workers using 45 mini buses.
- The site therefore generates 45 one way trips in the peak hours.
- The site is accessed directly off of the B1101.
- The speed limited in the vicinity of the site access is 60mph.
- There is an existing footway along side the B1101, no details have been provided on the footway width or condition.
- There is no cycle infrastructure present.
- There is an existing single bus stop at the site access, no assessment has been made of what infrastructure is provided at the bus stop. The stop is served by the No.56 with an hourly frequency.

- The proposal is for 58 dwellings, 44 flats, a convenience shop and a grass football pitch.
- TRICS has been used to calculate the trip rate for the site, the use of TRICS is acceptable. The TRICS assessment includes sites which are located in Ireland, this is not acceptable. The proposed trip rate is not acceptable, given the rural location of the site the trip rate is very low.
- Given the rural location of the site, 16% of trips being made to work by sustainable modes is not agreed.
- It is unlikely the football pitch would generate any vehicles during peak times.
- It is noted a 2m wide footway of unknown length will be provided on the northern side of the access, with a dropped kerb facility. This is to aid new resident crossing onto the footway on the opposite side of the road.
- Given the nature of the B1101, a 60mph unlit rural road. It is unlikely anyone from the site would cycle.

Conclusion:

The site is in a rural location, on a 60mph unlit road. No assessment has been made of the footway from the site heading north, no details of width or condition has been provided. No walk/cycle catchment plans have been provided to demonstrate the site is within suitable walking distance of local amenities.

The existing footway is on the opposite side of the B1101 to the site and no safe crossing facilities are being proposed for new residents. It appears from google that the existing footway is of limited width and there is no separation between the footway and the carriageway. This means residents would be within 1 metres of a vehicle travelling at 60mph, this is not desirable or acceptable. There is a missing section of footway at the junction of the B1101 with March Road, therefore pedestrians would have to walk in the carriageway of a 40mph speed limit unlit road.

No assessment has been made of the existing bus stop, it appears from google to be nothing more than a flag on the side of the road. The applicant is not proposing to upgrade this stop.

Given the nature of the B1101, an unlit 60mph country road, it would deter cyclists from using it.

As submitted the proposed development is not sustainable and would lead to a car lead development, contrary to the aims and objectives of the NPPF, LTN1/20, FDC local plan and Cambridgeshire County Council policies. The proposed development does not provide safe and suitable access for all users and would be highly dependent on car usage.

For the above reasons, recommends the application be refused.

5.6 Cambridgeshire Constabulary Designing Out Crime Officer - Comments received 23rd August 2021

Has viewed the documents in relation to crime, disorder and the fear of crime and has checked the constabulary crime and incident systems covering Friday Bridge for the last 3 years. Considers it to be an area of low vulnerability to the risk of crime at present.

The layout is acceptable in relation to crime prevention and the fear of crime, providing reasonable levels of natural surveillance from neighbours' properties with many of the homes facing each other and some overlooking the open space and football pitch. Pedestrian and vehicle routes are aligned together and overlooked suggesting that pedestrian safety has been considered, which should encourage some level of territoriality amongst residents. Most of the vehicle parking is in-curtilage between and to the sides of properties and garages. Parking for the flats is, however, on street, and while there appears to be surveillance from active rooms, these will need to be well lit. Many of the homes have back-to-back protected rear gardens which reduces the risk and vulnerability to crime, and have been provided with the potential for some defensible space to their front.

Paragraph 8.7 in the design and access statement is headed Security and mentions some crime prevention measures and Secured by Design. It is important that security and crime prevention are considered and discussed at the earliest opportunity to ensure that the security of buildings, homes, amenity space and the environment provide a safe place for residents and visitors.

While some security measures have been considered, has the following comments:

- What measures will be proposed for building security, cycle and bin store security, access control and mail delivery for the apartment blocks?;
- What door entry/access control will be proposed allowing access to residents only? Communal entrance doors should have no trade or timed release buttons;
- It would be good to see the proposed boundary treatments;
- Would like to see an External lighting plan (adoptable and private) including calculations and lux levels when available. For the safety of people and their property our recommendation is that all adopted and un-adopted roads, private and shared drives and parking areas should be lit by columns to BS5489:1 2020. Bollard lighting is only appropriate for wayfinding and should not be used as a primary lighting source for any roads or parking areas, where they are also prone to damage. Care should be taken in relation to the location of lighting columns with the entry method for the majority of dwelling burglary being via rear gardens. Lighting columns located next to rear/side garden walls with little surveillance from other properties can be used as a climbing aid to gain entry to the rear gardens.
- Measures should be considered to stop vehicles accessing the open space by fitting a knee rail or similar.

Would be happy to discuss Secured by Design, and measures to reduce the vulnerability to crime, with the applicant.

5.7 Anglian Water Services Ltd – Most recent comments received 19.08.2021, which are further to previous comments

No further comments to add to their previous response.

Comments raised within previous response

No objection, subject to a condition requiring a scheme for on-site foul water drainage works to be completed in accordance with a scheme to be agreed by the Local Planning Authority.

Assets Affected:

There are assets owned by Anglian Water or those subject to an adoption agreement within or close to the development boundary that may affect the layout of the site.

Wastewater Treatment:

Foul drainage is in the catchment of West Walton Recycling that will have available capacity for these flows.

Used Water Network:

Development may lead to an unacceptable risk of flooding downstream. Anglian Water will need to plan effectively for the proposed development, if permission is granted, and will need to work with the applicant to ensure any infrastructure improvements are delivered in line with the development. To make an accurate network capacity assessment, require a foul strategy showing the discharge point, conveyance method and pumped discharge rate if applicable. Therefore, request a condition requiring an on-site drainage strategy.

Surface Water Disposal:

The proposed method of surface water management does not relate to Anglian Water operated assets. As such, are unable to provide comments on the suitability of the surface water management. The Local Planning Authority should seek the advice of the Lead Local Flood Authority or the Internal Drainage Board. The Environment Agency should be consulted if the drainage system directly or indirectly involves the discharge of water into a watercourse.

5.8 Fenland District Council Housing Strategy – Comments received 3rd September 2021

On developments where 10 or more homes will be provided, the provisions of Policy LP5 of the Fenland Local Plan seeking 25% affordable housing apply.

Since this planning application proposes the provision of 102 number of dwellings, would expect a contribution of 26 affordable dwellings in this instance.

The current tenure split expected for affordable housing in Fenland is 70% affordable rented tenure and 30% shared ownership. This would equate to the delivery of 20 affordable rented homes and 6 shared ownership in this instance. Details of the housing and tenure mix can be discussed at a later date, as and when required.

5.9 Cambridgeshire County Council Flood Risk Team (Lead Local Flood Authority) – Most recent comments received 19th December 2024, which are further to previous comments

No objection in principle.

Notes that a half drain time above 24 hours is present at the site with the current proposed drainage infrastructure; however, as additional green open space has been identified for potential extra storage, if the half drain time can't be reduced, this can be offset with the provision of additional attenuation features. The above documents therefore demonstrate that there is sufficient space within the proposed development to accommodate necessary drainage infrastructure to manage surface water runoff from the site.

Requests that a condition is imposed requiring a detailed design of the surface water drainage of the site (based upon the principles within the agreed Flood Risk Assessment and Sustainable Drainage Strategy) to be submitted to, and approved by, the Local Planning Authority; and requiring that any elements of the surface water drainage system not adopted by a statutory undertaker be maintained and managed in accordance with a management and maintenance plan to be approved by the Local Planning Authority.

Comments raised within previous response

No objection in principle.

5.10 Fenland District Council Environmental Health - Comments received 6th September 2021

No objections.

Unlikely to object to the principle of any development where a high quality and sustainable living environment is to be created. From an environmental health perspective this will be subject to the satisfactory attention being given towards mitigating against the potential for noise and odour pollution during the development process, where the proposal involves the use of a brownfield site or where the demolition of existing structures is to take place, satisfactory conclusions have been reached that show the site is free from contamination or that the necessary remediation has been undertaken to ensure the site is suitable for the intended use and, that such a scheme positively contributes towards improving the health and wellbeing of people in support of sustainable and better ways to live and travel.

The application site has primarily been used to provide housing for workers employed in the area in recent times and contains a large number of buildings of mixed construction. The main proposal seeks to erect over 100 dwellings, a retail unit and sports changing facilities involving the demolition of existing buildings.

The Geo-environmental Desk Study, accompanying the application identifies a number of potential risks to future site users and the environment. As such, further environmental investigation work is necessary to confirm the nature of underlying ground conditions that may affect future site users and the environment, future infrastructure including local surface water drainage systems, and may also inform appropriate foundation design.

Welcomes this safe approach to addressing known and unknown site conditions given the nature of the proposal and scale of the application site and looks forward to receiving the results of the further (Phase 2) Environmental Investigation prior to any development taking place.

Notes that Anglian Water suggests the proposed development will lead to an unacceptable risk of flooding. Agrees it will be necessary to engage with the water authority to develop a drainage strategy to show how waste water will be conveyed and discharged, but also in terms of protecting the interests of human health and the environment.

This proposal seeks to include a local convenience store, this may also involve hot food provision at some point in the future although the latter is not implied in this application. While there are no details regarding the nature of mechanical refrigeration or other similar units or, hours of operation and delivery times, advise that the use refrigeration or other similar units including opening hours and deliveries can have some bearing on local residents in terms of unwanted noise disturbance. As the precise details of the store are yet to be determined, welcomes information demonstrating how the noise or air climate will be protected, being submitted to the Local Planning Authority at a later stage.

This application also seeks to provide sports facilities, comprising a playing field and changing rooms. Advise on the potential for unwanted noise and other disturbance from such venues unless appropriate mitigation measures have been incorporated into the overall design and fabrication of the facility. Notes the absence of a detailed lighting scheme for the proposed recreational facility. Suitable low-level lighting will need to be considered that creates a visible and safe environment without impacting upon the surrounding environment. Advise that any lighting on the development should meet current standards and should not cause light nuisance to neighbouring properties. The application does not state how the new open space will be managed or maintained. As the precise details of the recreational facility are yet to be determined, welcomes information demonstrating how light, noise or air climate will not be adversely affected, being submitted to the Local Planning Authority at a later stage.

The Air Quality Impact Assessment, accompanying the application, recognises that construction activities anticipated as part of the proposed development are often the most significant potential sources of fugitive dust emissions. The assessment states that appropriate dust control measures, as an example, can be highly effective for controlling emissions from potentially dust generating activities resulting in adverse effects being greatly reduced or eliminated. Welcomes this consideration and agrees that such measures to address environmental impacts can include the use of water suppression techniques, noise reducing barriers, sheeted or covered lorries, road sweeping etc. A Construction Environmental Management Plan will therefore be appropriate in these circumstances and looks forward to this being submitted during the planning process.

Supports a scheme where it is designed to maximise accessibility by increasing the use of non-vehicle modes as this positively contributes towards improving the health and wellbeing of people which this service supports as being a more sustainable and better way to live and travel. Therefore, welcome the submitted Health Impact Assessment that states provision can be made for electric car charging points, cycle storage and the take up of public transport. It has now been recognised that the use of electric vehicles reduces harmful pollutants being admitted into the atmosphere. Along with further information being provided that

renewable energy will also be incorporated into the proposed development, accepts the submission of this information with the final details being submitted to the LPA during subsequent planning stages.

Consequently, having addressed environmental impacts associated with noise, air climate, contamination health and wellbeing, has no objections to the proposed scheme and looks forward to receiving the requested information highlighted above if this proposal is taken forward.

5.11 Fenland District Council Conservation Officer – Most recent comments received 20th November 2024, which are further to previous comments

Friday Bridge Agricultural Camp is a former purpose-built Prisoner of War camp for prisoners of war during and immediately after WWII. It is therefore considered a heritage asset under the terms of the National Planning Policy Framework. It includes designated heritage assets and assets identified by the local planning authority (including local listing). This application has enabled the identification of this site as a non-designated heritage asset, in the absence of a formal adopted list. However, a formal list is in the process of being developed.

The Heritage Statement is detailed and sufficient.

Friday Bridge Agricultural Camp was constructed as a purpose-built Prisoner of War camp during World War Two. The purpose-built or 'Standard' camps were largely constructed during late 1942 and early 1943 and were in use until repatriation of prisoners in 1948. They were well known locally and in effect were settlements forming part of the wider civilian landscape. PoW labour made a significant contribution to the agricultural economy and over 25,000 Germans elected to stay after 1948, joining the British civilian population.

It was initially an Italian, then German Prisoner of War Working Camp where the inmates provided labour. In this area, that labour was agricultural.

According to Historic England only around 100 World War II PoW camps were purpose built in Britain and of these only around 10% are thought to survive. Those sites that retain a significant proportion of their original layout, with surviving features or buildings that are indicative of their use by PoWs will be regarded as of national importance.

Friday Bridge Camp is one such Prisoner of War Camp – purpose built and of the 'Standard' type. Historic England (then English Heritage) carried out a baseline recording project in 2003 and a classification system was designed to guide designation and planning decision making. Those with Partial Remains retain less than 50% of components (ranging from structures to paths/roads).

Out of the 372 PoW camps identified only 60 survive to any level of completeness. Of those 372 camps, 71 were identified as the 'Standard' type and of these only 22 survive to any level of completeness.

It is one of only 10 'Standard' camps nationally which survive with Partial Remains. It is one of only 6 identified Prisoner of War camps (of any type) in Cambridgeshire, and only two 'Standard' types have been identified in the county. It is the only site in the county with any level of above ground survival. The site comprises a water tower, headquarters, accommodation blocks, ablution block, Nissen Hut and guard hut at the entrance, amongst others.

Given the overall level of survival nationally and regionally of 'Standard' type PoW camps, the completeness of and significance attributed to Friday Bridge Camp needs to be fully assessed and the policies of the NPPF applied.

Friday Bridge Camp naturally fell into use as hostel accommodation for farm workers, following the end of World War II, often with the same men who had been held as prisoners but who had elected to stay. Friday Bridge Camp is believed to be the only site that continues to function in this role today. Its use therefore as agricultural hostel accommodation outstrips its use as a PoW camp by decades and new modern accommodation blocks have been constructed to continue this use. However, this does not diminish its historic and social significance in any way. Indeed, its current threat of redundancy as a direct result of the Brexit vote and the resulting current economic climate (delayed by the Covid 19 Pandemic) and the impact this has had on the European workers which underpin so much of our agricultural labour in this region, could be seen to add another level of significance to this site at a national level.

It should be noted that Fenland District Council, is working in partnership with Cambridgeshire County Council to identify and adopt a formal list of local heritage assets, and whilst this site has now been identified as such as a result of the planning process, it will be added to a formal list as part of the project funded by the DCMS. It is also identified on the Cambridgeshire Historic Environment Record (ref MCB 17104) and may warrant formal designation.

Under the terms of the NPPF, a balanced judgement is required to have regard to the scale of any harm or loss and the significance of the heritage asset. Friday Bridge is a former Prisoner of War camp, with considerable partial Remains. It is a unique survival within Fenland and the wider county and is of national historic significance. The current proposal seeks almost total demolition.

Waldersea House is an early 19th century house with associated outbuildings, including dovecot, farmyard complex and countryside setting (historic map evidence), some of which survives, and which is listed at grade II. The presence of the camp opposite for nearly 70 years and its own use as a healthcare establishment has long since altered the setting of the listed building and no sense of a rural farmhouse with associated surrounding countryside and associated outbuildings, survives. It is therefore not felt that the principle of the proposed development will alter that setting significantly, providing that the mature and dense screening, remains and is maintained.

Conclusions:

The application to Historic England for listing the site was unsuccessful, due to its lack of completeness of the camp as a result of its later uses as an agricultural camp and loss of parts of the original buildings and plan form.

It is, however, the only remaining POW camp in the county with a good level of survival and potential for below ground remains and as such is undoubtedly of local interest. It is therefore clearly a non-designated heritage asset, as per the National Planning Policy Framework.

Within the camp, specific huts retain their original plan form and appearance and are therefore worthy of consideration individually as buildings of local interest. It also has added local and regional interest as an agricultural camp and possibly the

largest in Europe. Even in its reduced state, the camp has medium to high communal and emotional value.

The Heritage Statement states that 'whilst there is undoubtedly scope for demolition and capacity within the site for new development, the degree of harm will be directly proportional to the extent of the demolition. Therefore, the best option for any detailed proposals and reserved matters may be selective removal of World War Two buildings-based on intactness, current condition, group value and the potential scope for adaption and reuse'.

The current proposal, to demolish almost all buildings associated with the Prisoner of War Camp from the site bar a couple of buildings and the nissen hut which is to be substantially remodelled, would result in a substantial level of harm to the heritage asset and are divergent with the advice provided within the Heritage Statement.

The references to a 'Heritage Park' are not provided with any information of how this will be run, funded, staffed or accessed, which is considered to be of importance.

Efforts have not yet been made to incorporate as many remaining structurally sound buildings into the scheme and design the developable areas in a manner that respects the retained buildings and the history of the site, for which the current proposals fail to do. It is a relatively non-descript residential development in a location of questionable sustainability that retains little historic significance of the site.

The proposals fail to accord with the National Planning Policy Framework and policy LP18 of the Fenland Local Plan and should be refused unless there are strong public benefits that outweigh the harm.

Conditions:

Should a decision be made to grant the application a Building Recording Condition should be applied, and a record should be made in accordance with Historic England's guidance 'Understanding Historic Buildings. A guide to Good Recording Practice', to Level 4, the details of which should be agreed with the County Archaeology Unit, or the Local Authority Conservation Officer.

Recommendation: Refuse

Comments raised within previous responses

The original Heritage Impact Statement was inadequate [since resolved following receipt of an acceptable Heritage Impact Statement].

Originally recommended that the application be refused until the significance of the site had been addressed and accommodated in a revised application. However, recommended that, should a decision be made to grant the application, a Building Recording Condition should be applied, and a record should be made in accordance with Historic England's guidance 'Understanding Historic Buildings. A guide to Good Recording Practice', to Level 4, the details of which should be agreed with the County Archaeology Unit, or the Local Authority Conservation Officer.

5.12 The Wisbech Society – Most recent comments received 4th August 2022, which are further to previous comments

Object to the demolition and redevelopment of a unique Fenland heritage asset and its replacement with a, nebulous at best, application to build houses in an area that is environmentally/biodiversity unsuited with inadequate highways and services provision.

Comments raised within previous response

Objects to the application, for the following reasons:

- The Heritage Statement supplied by the Developer does not attest to the historic significance of this WW2, purpose built POW Camp, even though it is one of the few remaining camps that still exist in the country and is unique to Fenland. This is contrary to National Planning Policy Framework (NPPF), July 2021 - paragraph 194; and Fenland Local Plan (2014) - LP18. The Heritage Statement only deals with the impact on the setting of the Grade 2 listed Waldersea House and ignores the history of the camp entirely.
- The POW Camp is a local heritage asset and as such deserves to be preserved within its current usage.
- There are, we understand, artworks within the camp painted by POW's that are of historic interest.
- Although modernised, up to 50% of the original camp buildings still survive and are still in use as accommodation by European agricultural workers, in a remarkable continuation of its use since the 1940's.
- The opposite Grade 2 listed Waldersea House will have its setting affected by this large development and increased traffic and noise made by private vehicles (most of the current occupants of the camp use WMS Recruitment buses to leave/access the camp).
- The camp is currently serviced by a B road and any increased road traffic could prove a hazard.
- The proposed development is remote from the village and is an over development without proposed road and lighting amenity improvements.

5.13 Fenland District Council Principal Ecologist – Comments received 13th March 2025, which are further to previous comments from the Local Planning Authority's former ecology advisory services

Accepts that the level of bat survey effort, taken together with the proposals for mitigation measures which would be available for any disturbance to bats, are sufficient to give a level of confidence to the Council that if permission were to be granted to the development the conservation status of bats would be able to be conserved.

Of particular note is that –

- The apparent level of bat use of the site recorded during the surveys which have been carried out involved low numbers of bats of relatively common species. Although bat roosting sites were recorded, these appeared to be low-status roosts.
- Mitigation for bats, including replacement roosting provision, would be available, including a dedicated structure for use by roosting bats, to be incorporated into the new development design. This structure should be included as part of any detailed Reserved Matters application.

Concludes that no further level of bat survey is required before deciding the application, but that further bat surveys should be required by condition to provide a detailed and up-to-date picture of bat use of the site to inform detailed mitigation and detailed design.

Since known bat roosts will be affected by the development, a protected species License will need to be obtained from Natural England before any work can commence which could affect bats. Obtaining this License is a separate process from obtaining a grant of planning permission, and the License application will require up-to-date survey information.

Notes that in order to achieve a 'no net loss' in biodiversity the development may need to purchase off-site Biodiversity Credits from a Habitat Bank, since sufficient habitat compensation may not be able to be achieved on-site. Would prefer it if the details of the off-site habitat provision were to be provided prior to deciding the application, however accepts that this detail could be required by condition.

Previous comments received within responses from the Local Planning Authority's former ecology advisory services:

- The Phase 2 Bat Survey report addresses previous concerns raised.
- A final version of the Preliminary Ecological Appraisal was requested.
- A Biodiversity Net Gain assessment was requested.
- Requested planning conditions requiring additional ecology information.
- Due to the traditional survey method resulting in an extremely heavy survey load, accepted a survey approach to inform the outline planning only, requiring further surveys works to be undertaken at the detailed planning stage.
- A summer roost and hibernation roost has already been confirmed and these roosts are due to be removed by the proposal. As there are known roosts on site, there will be a requirement for a Natural England Protected Species Disturbance License which has been counter signed by Natural England.

5.14 District Councillor Matthew Summers - Comments received 05.12.2024

Objects to the application, citing the same reasons as Elm Parish Council and the Local Highway Authority. In addition, the application does not accord with the following local policies:

- LP1 - Sustainable development
- LP3 - Settlement hierarchy - Friday Bridge is a restricted growth village
- LP12 a - Not in or adjacent to existing footprint
- LP12 d - Not in keeping with existing built form
- LP12 j - Highways risks for cyclists and pedestrians have been identified

5.15 Local Residents/Interested Parties

Representations from 9 properties supporting the application are summarised below. The locations of these properties are as follows:- 2x Fridaybridge, 1x Elm, 1x Walsoken, 4x Wisbech and 1x Upwell.

- Would provide re-use and regeneration of the site. The site is becoming no longer fit for purpose and needs to move forward.
- Would prevent the site falling into disrepair or abandonment and harming the landscape.
- Ideal location for housing.
- Would provide additional much-needed and affordable housing.
- Would provide new opportunities and prosperity to the area.
- Would retain reference to the sites history. The history of the site should not prevent progress.
- There is precedence for construction due to previous development.
- The proposal would generate no more traffic than already exists.
- Challenges around roads and infrastructure etc cannot get in the way of moving on.
- There is nothing there of significance that warrants keeping as Historic England have shown they are not interested in the site.

Representations received from 7 properties objecting to the application (in addition to representations from 3 properties neither supporting or objecting to the application) are summarised below. The locations of these properties are as follows:- 8x Fridaybridge, 1x Coldham and 1x Market Deeping.

- Does not align with Local Plan policies.
- Would result in an isolated settlement, detached from local services and communities.
- Future occupiers would struggle to integrate into the community.
- It is not clear that there is a genuine need / demand for the proposal.
- Would impact the rural character of the countryside.
- High density development is inappropriate.
- The proposal would have harmful highway / pedestrian safety impacts.
- Lack of infrastructure and services to serve the development.
- A previous planning application on the site was refused.
- Various planning applications to develop housing at No.41 March Road have been refused.
- Would cause residential amenity harm to existing and proposed dwellings.
- Would increase flood risk.
- Would harm ecology.
- Would result in the loss of heritage assets.
- Would degrade property values.

6 STATUTORY DUTY

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires a planning application to be determined in accordance with the Development Plan unless material planning considerations indicate otherwise. The Development Plan for the purposes of this application comprises the adopted Fenland Local Plan (2014) and the Cambridgeshire and Peterborough Minerals and Waste Local Plan (2021).

Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires Local Planning Authorities when considering development to pay special attention to preserving a listed building or its setting.

7 POLICY FRAMEWORK

National Planning Policy Framework (NPPF) 2024

Chapter 2 - Achieving sustainable development
Chapter 4 – Decision-making
Chapter 5 – Delivering a sufficient supply of homes
Chapter 6 – Building a strong, competitive economy
Chapter 8 – Promoting healthy and safe communities
Chapter 9 – Promoting sustainable transport
Chapter 11 – Making effective use of land
Chapter 12 – Achieving well-designed places
Chapter 14 – Meeting the challenge of climate change, flooding and coastal change
Chapter 15 – Conserving and enhancing the natural environment
Chapter 16 - Conserving and enhancing the historic environment

National Planning Practice Guidance (NPPG)

National Design Guide 2021

Fenland Local Plan 2014

LP1 – A Presumption in Favour of Sustainable Development
LP2 – Facilitating Health and Wellbeing of Fenland Residents
LP3 – Spatial Strategy, the Settlement Hierarchy and the Countryside
LP4 – Housing
LP5 – Meeting Housing Need
LP6 – Employment, Tourism, Community Facilities and Retail
LP12 – Rural Areas Development Policy
LP13 – Supporting and Managing the Impact of a Growing District
LP14 – Responding to Climate Change and Managing the Risk of Flooding in Fenland
LP15 – Facilitating the Creation of a More Sustainable Transport Network in Fenland
LP16 – Delivering and Protecting High Quality Environments across the District
LP17 – Community Safety
LP18 – The Historic Environment
LP19 – The Natural Environment

Cambridgeshire and Peterborough Minerals and Waste Local Plan 2021

Delivering and Protecting High Quality Environments in Fenland SPD 2014

Developer Contributions SPD 2015

Cambridgeshire Flood and Water SPD 2016

Emerging Local Plan

The Draft Fenland Local Plan (2022) was published for consultation between 25th August 2022 and 19 October 2022, all comments received will be reviewed and any changes arising from the consultation will be made to the draft Local Plan. Given the very early stage which the Plan is therefore at, it is considered, in accordance with Paragraph 49 of the NPPF, that the policies of this should carry extremely limited weight in decision making. Of relevance to this application are policies:

LP1: Settlement Hierarchy

LP2: Spatial Strategy for the Location of Residential Development
LP4: Securing Fenland's Future
LP5: Health and Wellbeing
LP7: Design
LP8: Amenity Provision
LP11: Community Safety
LP12: Meeting Housing Needs
LP17: Culture, Leisure, Tourism and Community Facilities
LP18: Development in the Countryside
LP19: Strategic Infrastructure
LP20: Accessibility and Transport
LP22: Parking Provision
LP23: Historic Environment
LP24: Natural Environment
LP25: Biodiversity Net Gain
LP27: Trees and Planting
LP28: Landscape
LP29: Green Infrastructure
LP31: Open Space and Recreational Facilities
LP32: Flood and Water Management
LP33: Development on Land Affected by Contamination
LP34: Air Quality

8 KEY ISSUES

- Principle of development
- Sustainable travel and highway safety
- Character and appearance
- Heritage assets
- Residential amenity
- Affordable housing provision
- Infrastructure capacity
- Housing mix
- Flood risk and drainage
- Trees
- Biodiversity
- Biodiversity Net Gain (BNG)

9 ASSESSMENT

Principle of development

- 9.1 Policy LP2 of the Fenland Local Plan 2014 states that development proposals should positively contribute to creating a healthy, safe and equitable living environment by creating an environment (built and social) in which communities can flourish; creating sufficient and the right mix of homes to meet people's needs, and in the right location.
- 9.2 Policy LP3 of the Fenland Local Plan 2014 states that the focus for the majority of housing growth is in and around the four market towns; and that development should create strong, sustainable, cohesive and inclusive communities, making the most effective use of previously developed land (except where that land is of high environmental value), and enabling a larger number of people to access jobs,

services and facilities locally. Furthermore, policy LP3 states that decisions on the location and scale of new development will be taken on the basis of the Fenland Settlement Hierarchy which is specified within the policy. The Fenland Settlement Hierarchy designates Friday Bridge as a 'Limited Growth Village', where a small amount of development and new service provision will be encouraged and permitted in order to support the continued sustainability of the village, which may be appropriate as a small village extension.

- 9.3 Paragraph 3.3.10 of the Local Plan states that policy LP3, together with other policies, steers most new development to those larger places that offer the best access to services and facilities (both now and for the foreseeable future); and that this can help reduce the need to travel, as well as making best use of existing infrastructure and previously developed land in built-up areas.
- 9.4 Due to the proposed quantum of development, and its significant separation distance from the built settlement of the village, it is considered that the proposed development is not a 'small village extension' for the purposes of assessment against criteria LP3 of the Local Plan and its location is also in conflict with policy LP12 of the Local Plan. Due to its significant separation distance from the built settlement of the village, it is considered to fall within the category of an 'Elsewhere' location as specified within policy LP3 of the Local Plan, where development is restricted to that which is demonstrably essential to the effective operation of local agriculture, horticulture, forestry, outdoor recreation, transport or utility services; and to minerals or waste development in accordance with separate Minerals and Waste Local Development Documents (LDDs). As the proposed development does not fall within one of the above exceptions, the proposed development is contrary to policy LP3 of the Local Plan.
- 9.5 As the site is not in or adjacent to the existing developed footprint of the village, the location of the proposed development is also in conflict with policy LP12 of the Local Plan.
- 9.6 Although the site comprises previously developed land, paragraph 3.3.10 makes it clear that the policy LP3, and other policies, of the Local Plan steers most new development to those larger places that offer the best access to services and facilities; as well as making best use of previously developed land in 'built-up areas'. In addition, paragraph 125 of the National Planning Policy Framework makes it clear that decisions should give substantial weight to the value of using suitable brownfield land 'within settlements' for homes and other identified needs, proposals for which should be approved unless substantial harm would be caused, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land. The proposed development would not re-use suitable brownfield land within a built-up area or within a settlement, and the proposed development would result in substantial harm being caused for the reasons set out within this report. It is therefore considered that the proposed re-use of previously developed (brownfield) land does not outweigh the harm which would result from the proposed development.
- 9.7 The proposed development is located within an 'Elsewhere' location and is not demonstrably essential to the effective operation of local agriculture, horticulture, forestry, outdoor recreation, transport or utility services; nor is it minerals or waste development. The proposed development would result in a major residential development being located within an unsustainable, countryside location with poor connections to local services and facilities. By virtue of its location, quantum and use, the proposed development would fail to contribute to the sustainability of the

settlement and would harm the wider open character of the countryside. The proposed development is therefore contrary to policies LP2 and LP3 of the Fenland Local Plan 2014.

Sustainable travel and highway safety

- 9.8 Policy LP2 of the Fenland Local Plan 2014 states that development proposals should positively contribute to creating a healthy, safe and equitable living environment by, *inter alia*, providing and maintaining effective, sustainable and safe transport networks to ensure access to all essential services.
- 9.9 Policy LP15 of the Fenland Local Plan 2014 states, *inter alia*, that development on a site should be located and designed so that it can maximise accessibility and help to increase the use of non-car modes; and that development schemes should provide well designed, safe and convenient access for all, giving priority to the needs of pedestrians, cyclists, people with impaired mobility and users of public transport by providing a network of pedestrian and cycle routes and green corridors including habitat connectivity (linking to existing routes where opportunities exist) that give easy access and permeability to adjacent areas.
- 9.10 Paragraph 83 of the National Planning Policy Framework states that, to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities.
- 9.11 Paragraph 110 of the National Planning Policy Framework states that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes, whilst acknowledging that opportunities to maximise sustainable transport solutions will vary between urban and rural areas.
- 9.12 Paragraph 115 of the National Planning Policy Framework states that, in assessing applications for development, it should be ensured that, *inter alia*, sustainable transport modes are prioritised taking account of the site, the type of development and its location; and safe and suitable access to the site can be achieved for all users.
- 9.13 Paragraph 116 of the National Planning Policy Framework states that development should be refused on highways grounds if there would be an unacceptable impact on highway safety.
- 9.14 The application site is located approximately 0.8 metres from the edge of the continuous built settlement, and approximately 1.5 kilometres from the village centre, of Friday Bridge. The application site is accessed off the B1101 (March Road), which connects the application site to the centre of Friday Bridge. March Road has a 60mph speed limit for approximately 600 metres to the north of the application site, at which point it changes to 40mph for approximately 500 metres, then 30mph on approach towards the centre of the village. The first 800 metres of the road connecting the application site to Friday Bridge does not have any streetlighting and there is no dedicated cycle route into the village. There is a narrow footway directly adjacent to the carriageway on the west side of March Road, which does not appear to be of a safe and suitable width for all users, particularly those with wheelchairs, pushchairs or children, and which would require future occupiers of the proposed development to cross a 60mph unlit road in order to access it. There is a bus stop opposite the application site, however it is

served by a limited bus service and there would be no other public transport facilities to serve future occupiers of the proposed development.

- 9.15 The Local Highway Authority Development Management Team has raised concerns about the general sustainability of the site, stating that it is likely to result in almost all movements being made by private motor transport; that the site is remote from the village; that the bus service is limited and potentially unsuitable for accessing employment; and that the pedestrian route is on unlit, rural roads with no dedicated cycling route. Furthermore, they have recommended that provision of a continuous footway (of two metres in width, where possible) between the proposed development and the urban settlement / 30 miles per hour limit, including a safe crossing of Jew House Drove, is required to make the development acceptable in highway safety terms.
- 9.16 The application proposes a small section of new footway along part of the frontage of the application site and a new dropped kerb crossing to facilitate pedestrian connectivity to the west side of March Road. However, the application does not include the provision of the footway and crossing improvements which the Local Highway Development Management Team consider are necessary to ensure adequate highway safety.
- 9.17 The Local Highway Authority Development Management Team has objected to the application on the basis that the application fails to demonstrate that safe and suitable pedestrian access can be provided to Friday Bridge, and that the proposed bus stop works are feasible / deliverable within the extent of public highway.
- 9.18 The Local Highway Authority Transport Assessment Team also recommends that the application is refused and raise concerns including:- that the existing footway is of limited width and has no separation from the carriageway, meaning residents would be within 1 metre of a vehicle travelling at 60mph which is not desirable or acceptable; that there is a missing section of footway at the junction of the B1101 with March Road and therefore pedestrians would have to walk in the carriageway of a 40mph speed limit unlit road; that the nature of the B1101 (an unlit 60mph country road) would deter cyclists from using it; that the proposed development is not sustainable and would lead to a car lead development; and that the proposed development would not provide safe and suitable access for all users who would be highly dependent on car usage.
- 9.19 East of England Ambulance Service NHS Trust (EEAST) has raised concerns with the proposed development, relating to:- the necessity which would arise for pedestrians (including children) to cross, and walk on footways alongside, roads with speed limits of 40 miles per hour and 60 miles per hour; the limited width of the footway which is prone to being overgrown; the absence of street lighting; the potential for the volume of traffic to be greater than that identified within the Transport Assessment accompanying the application; the absence of local accident data for the last 3-5 years accompanying the application.
- 9.20 Similar concerns to those raised by the Local Highway Authority, and also EEAST, in relation to highway safety and sustainability, have also been raised within representations received by a District Councillor, Elm Parish Council and local residents.
- 9.21 Cambridgeshire County Council Highways Development Management Team also raised concerns regarding whether a suitable vehicular access could be achieved

on land within the control of the applicant. Additional highway information and an amended location plan, showing the relevant additional land to be within the control of the application, has been submitted during the course of the application. It is considered that the additional information demonstrates an acceptable vehicular access could be achieved on land within the control of the applicant; however details of the access are reserved at this stage and would require future approval at a subsequent reserved matters stage in any event of planning permission being approved.

- 9.22 With consideration given to the concerns raised within the representations received, particularly with regards to those received from the Local Highway Authority and EEAST who have raised concerns regarding the safety of pedestrians, the Local Planning Authority consider that the proposed development would promote unsustainable forms of travel and have an unacceptable impact on highway safety.
- 9.23 By virtue of its location, quantum and use; and the absence of adequate local pedestrian and cycle infrastructure and public transport facilities to provide sustainable, safe and convenient access to nearby services and facilities; the proposed development would promote unsustainable forms of travel and would result in harm to highway safety, contrary to policies LP2 and LP15 of the Fenland Local Plan 2014 and paragraphs 83, 110, 115 and 116 of the National Planning Policy Framework.

Character and appearance

- 9.24 Policy LP16 of the Local Plan requires development proposals to make a positive contribution to the local distinctiveness and character of the area, enhance its local setting, respond to and improve the character of the local built environment, reinforce local identity and not adversely impact, either in design or scale terms, on the street scene, settlement pattern or the landscape character of the surrounding area.
- 9.25 Due to its location, and separation from any existing built settlement, the proposed development would not result in coalescence with any neighbouring village, extend existing linear features of the settlement or result in ribbon development. In addition, the indicative site layout plan and Arboricultural Implications Assessment indicate that the proposed development could retain the natural boundaries.
- 9.26 The application site contains a number of existing buildings; however they are of a lower scale and density, a less formal and more rural character, and have a lower intensity of use, than would be the case for the proposed residential development and necessary associated infrastructure such as formal roads, footways and streetlighting. The proposed development would result in a formally planned, major-scale residential development within the countryside, in a location where it would not relate sympathetically to the predominant rural character and appearance of the area.
- 9.27 By virtue of its location, quantum and use, the proposed development would result in residential development of a scale and in a location that is not in keeping with the core shape and form of the settlement; would appear significantly at odds with nearby built form; and would significantly urbanise and erode the rural character and appearance of the area including the countryside. As such, it is considered that the proposed development fails to respond to the character of the local built environment, would be detrimental to the local distinctiveness of the area, and

would adversely impact the character and appearance of the area including the countryside, contrary to policy LP16 of the Local Plan.

Heritage assets

Impacts on a non-designated heritage asset – Former Prisoner of War Camp

9.28 Policy LP16 of the Fenland Local Plan 2014 requires that proposals for all new development to protect and enhance any affected heritage assets and their settings to an extent commensurate with policy in the National Planning Policy Framework and in accordance with Policy LP18 of the Fenland Local Plan 2014.

9.29 The National Planning Policy Framework defines a heritage asset as:
“A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).”

9.30 Paragraph 210 of the National Planning Policy Framework states:
“In determining applications, local planning authorities should take account of:

a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;

b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and

c) the desirability of new development making a positive contribution to local character and distinctiveness.”

9.31 Paragraph 216 of the National Planning Policy Framework states:
“The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.”

9.32 Friday Bridge Agricultural Camp is a former purpose-built POW camp for Italian and German prisoners of war during, and immediately after, World War Two. The Council's Conservation Officer has provided the following comments regarding its significance:

“According to Historic England only around 100 World War II PoW camps were purpose built in Britain and of these only around 10% are thought to survive. Those sites that retain a significant proportion of their original layout, with surviving features or buildings that are indicative of their use by PoWs will be regarded as of national importance. These camps, with a small amount of variation would commonly consist of, living huts, cookhouse, latrine blocks, camp reception station (sick quarters), guards' accommodation, water towers, administration office and detention block, among other facilities.

Friday Bridge Camp is one such Prisoner of War Camp – purpose built and of the ‘Standard’ type. Historic England (then English Heritage) carried out a baseline recording project in 2003 and a classification system was designed to guide designation and planning decision making. Those termed ‘Complete’

retain the majority of their original structures and layout intact. Those that are near complete retain the majority of their features with 50-80% survival. Those with Partial Remains retain less than 50% of components (ranging from structures to paths/roads) and the rest are classified as 'Removed' although the footprint may survive. Some remain 'Unresolved' where evidence is either not visible, or inconclusive.

Out of the 372 PoW camps identified only 60 survive to any level of completeness. Of those 372 camps, 71 were identified as the 'Standard' type and of these only 22 survive to any level of completeness.

It is one of only 10 'Standard' camps nationally which survive with Partial Remains. It is one of only 6 identified Prisoner of War camps (of any type) in Cambridgeshire, and only two 'Standard' types have been identified in the county. It is the only site in the county with any level of above ground survival. The site comprises a water tower, headquarters, accommodation blocks, ablution block, Nissen Hut and guard hut at the entrance, amongst others.

All surviving sites will have a degree of significance, even where only the plan form remains. These sites are significant for historical and social reasons, and in view of their local impact and contribution to a sense of place. Given the overall level of survival nationally and regionally of 'Standard' type PoW camps, the completeness of and significance attributed to Friday Bridge Camp needs to be fully assessed and the policies of the NPPF applied.

Friday Bridge Camp naturally fell into use as hostel accommodation for farm workers, following the end of World War II, often with the same men who had been held as prisoners but who had elected to stay. Friday Bridge Camp is believed to be the only site that continues to function in this role today. Its use therefore as agricultural hostel accommodation outstrips its use as a PoW camp by decades and new modern accommodation blocks have been constructed to continue this use. However, this does not diminish its historic and social significance in any way. Indeed, its current threat of redundancy as a direct result of the Brexit vote and the resulting current economic climate (delayed by the Covid 19 Pandemic) and the impact this has had on the European workers which underpin so much of our agricultural labour in this region, could be seen to add another level of significance to this site at a national level.

Under the terms of the NPPF, a balanced judgement is required to have regard to the scale of any harm or loss and the significance of the heritage asset. Friday Bridge is a former Prisoner of War camp, with considerable partial Remains. It is a unique survival within Fenland and the wider county and is of national historic significance.

The current proposal seeks almost total demolition, and the application has now been furnished with a detailed heritage statement that addresses the significance of the site."

9.33 The Council's Conservation Officer has stated that the Fenland District Council are currently working towards adoption of a formal list of local heritage assets and Friday Bridge Agricultural Camp will be added to this. In addition, the Conservation Officer states that it is also identified on the Cambridgeshire Historic Environment Record (ref MCB 17104). Due to its heritage interest, the Local Planning Authority consider Friday Bridge Agricultural Camp to be a non-designated heritage asset. In

accordance with paragraphs 210 and 216 of the National Planning Policy Framework, consideration is therefore given to the significance of this non-designated heritage asset, and the scale of harm and loss which would result from the proposed development.

- 9.34 The Heritage Impact Statement states that 'whilst there is undoubtedly scope for demolition and capacity within the site for new development, the degree of harm will be directly proportional to the extent of the demolition. Therefore, the best option for any detailed proposals and reserved matters may be selective removal of World War Two buildings-based on intactness, current condition, group value and the potential scope for adaption and reuse'. Furthermore, the Heritage Impact Statement assesses the magnitude of the impact for selective demolition of the World War Two buildings within the site as causing 'less than substantial harm', and the magnitude of impact for the complete demolition of the original camp buildings as high adverse (which is defined as 'the alterations severely harm the heritage assets, heritage values of the heritage asset or the ability to appreciate its significance values').
- 9.35 The proposed development would result in the demolition of almost all of the buildings associated with the POW Camp, apart from a couple of buildings and the Nissen Hut which is to be substantially remodelled. The Conservation Officer considers that the proposed development would result in a substantial level of harm to the heritage asset. The Conservation Officer also notes that the references within the application to a 'Heritage Park' are not provided with any information of how this will be run, funded, staffed or accessed, which is considered to be of importance. Consideration has also been given to representations received from Elm Parish Council, The Wisbech Society and local residents in relation to the loss of former POW buildings. heritage assets impacts on the former POW received
- 9.36 In accordance with the requirements of paragraph 216 of the National Planning Policy Framework, in weighing the application, a balanced judgement is required having regard to the scale of any harm or loss and the significance of the heritage asset. With consideration given to the significance of the non-designated heritage asset (taking into account the assessment made within the Heritage Impact Statement and the assessment made by the Conservation Officer), it is considered that the proposed development would cause substantial harm (through substantial loss) to a non-designated heritage asset, which would not be outweighed by the moderate public benefits associated with the proposed development, contrary to policy LP18 of the Fenland Local Plan and paragraph 216 of the National Planning Policy Framework.

Impacts on a designated heritage asset – Waldersea House (Grade II listed)

- 9.37 In addition, the proposed development is located within the setting of Waldersea House, a Grade II listed building. In accordance with paragraphs 210-215 of the National Planning Policy Framework, consideration is therefore also given to the impact of the proposed development on the setting of this designated heritage asset.
- 9.38 The Council's Conservation Officer has provided the following assessment of the impacts of the proposed development on the setting of this listed building.

"Waldersea House is an early 19th century house with associated outbuildings, including dovecot, farmyard complex and countryside setting (historic map evidence), some of which survives, and which is listed at grade II. The presence of

the camp opposite for nearly 70 years and its own use as a healthcare establishment has long since altered the setting of the listed building and no sense of a rural farmhouse with associated surrounding countryside and associated outbuildings, survives. It is therefore not felt that the principle of the proposed development will alter that setting significantly, providing that the mature and dense screening, remains and is maintained.”

- 9.39 In agreement with the recommendations of the Council’s Conservation Officer and for the reasons specified within their consultation response, the Local Planning Authority do not consider that the principle of development would result in any harm to the setting of Waldersea House. Further consideration of the impacts of the development on this nearby listed building would need to be made at a Reserved Matters stage, in any event of planning permission being granted. It is therefore considered that the proposed development would not cause harm to the nearby Grade II listed building (Waldersea House), in accordance with policy LP18 of the Fenland Local Plan and the provisions of the National Planning Policy Framework.

Residential amenity

- 9.40 Policy LP2 of the Fenland Local Plan 2014 states that development proposals should positively contribute to creating a healthy, safe and equitable living environment by, inter alia, promoting high levels of residential amenity.
- 9.41 Policy LP16 of the Fenland Local Plan 2014 requires that proposals for all new development do not adversely impact on the amenity of neighbouring users such as noise, light pollution, loss of privacy and loss of light.
- 9.42 In order to grant planning permission for up to 102No. dwellings, it is considered that the Local Planning Authority must be satisfied that an acceptable scheme for the maximum number of dwellings being proposed could be accommodated within the site, whilst providing and maintaining high levels of residential amenity.
- 9.43 No detailed matters are committed as part of this outline planning application. However, the application is accompanied by an indicative site layout plan which demonstrates that 102No. dwellings could be accommodated within the application site with sufficient separation distances to prevent any significant adverse impacts to the residential amenity, and the health and wellbeing, of existing neighbouring users.
- 9.44 Although the indicative site layout plan demonstrates that the proposed development could have acceptable impacts on the residential amenity of neighbouring users outside of the application site, it fails to demonstrate that a high level of residential amenity could be provided for future occupiers of the proposed development due to the close proximity and related overshadowing impacts of retained trees on the proposed dwellings and gardens.
- 9.45 The application is supported by an Arboricultural Impact Assessment (AIA) which indicates that some areas of the proposed development, particularly near to the southern and western boundaries, would be significantly shaded by existing trees to be retained. The AIA states that a detailed design must aim to avoid proposed dwellings in such areas, to avoid prevent potential conflict that may lead to tree removals by future residents. The AIA concludes that shade and proximity issues are apparent and that design considerations must be accommodated to give greater distances between dwellings and trees. However, the application fails to

demonstrate that the proposed quantum of development could be accommodated within the site without the proposed dwellings and associated gardens being significantly overshadowed by existing trees to be retained within, and along the boundaries of, the application site.

- 9.46 The application therefore fails to demonstrate that a high level of residential amenity could be provided for future occupiers of the proposed development, contrary to policy LP2 of the Local Plan.

Affordable housing provision

- 9.47 Policy LP2 of the Fenland Local Plan 2014 states that development proposals should positively contribute to creating a healthy, safe and equitable living environment by, inter alia, creating sufficient and the right mix of homes to meet people's needs, and in the right location.
- 9.48 Policy LP5 of the Local Plan specifies that, on sites of 10 or more dwellings, the Council will seek the provision of 25% of the dwellings as affordable houses (rounded to the nearest whole dwelling); however, the Council will negotiate with developers if an accurate viability assessment indicates these cannot be met in full. To inform the preparation of Fenland's emerging Local Plan, a Viability Assessment was undertaken which looked at the cost of building new homes and the costs associated with the policies in this Local Plan. This concluded that viability in Fenland is marginal and varies between localities in the district and indicates that 20% affordable housing is likely to be the maximum level of provision that can be achieved through planning obligations. With consideration given to the age of the application and the Viability Assessment, it is noted that provision of 20% affordable housing would be acceptable to the Local Planning Authority in this instance.
- 9.49 In addition, policy LP5 of the Local Plan states that affordable housing shall be provided on-site, unless the developer can demonstrate exceptional circumstances which necessitate provision on another site, or the payment of a financial contribution (of broadly equivalent value) to the Council to enable some housing need to be met elsewhere. The Council, in undertaking negotiations, will take into account the financial viability of any individual scheme (using a recognised viability model).
- 9.50 The application form specifies that all of the proposed dwellings would be market housing. The proposed development is therefore for up to 102No. dwellings, comprising 100% market housing.
- 9.51 The application is also not accompanied by a Heads of Terms agreeing to the provision of any affordable housing provision or contributions. In addition, the application is not accompanied by a viability assessment providing any evidence to confirm that the proposed development would be unviable with the provision of affordable housing or a financial contribution in lieu of affordable housing provision.
- 9.52 The proposed development would not provide any affordable housing or a contribution in lieu of affordable housing provision, and the application is not accompanied by any evidence to confirm that the proposed development would be unviable with the provision of affordable housing or a financial contribution in lieu of affordable housing provision, contrary to policy LP5 of the Local Plan.

Infrastructure capacity

- 9.53 Policy LP13 of the Fenland Local Plan 2014 states that all new development should be supported by, and have good access to, infrastructure. Furthermore, policy LP13 states that planning permission will only be granted if it can be demonstrated that there is, or will be, sufficient infrastructure capacity to support and meet all the requirements arising from the proposed development. Conditions or a planning obligation are likely to be required for many proposals to ensure that new development meets this principle. Developers will either make direct provision or will contribute towards the provision of local and strategic infrastructure required by the development either alone or cumulatively with other developments. Where a planning obligation is required, in order to meet the above principles of infrastructure provision, this will be negotiated on a site-by-site basis. This will be required in addition to the affordable housing requirement as set out in policy LP5 of the Local Plan.
- 9.54 Statutory tests set out in the Community Infrastructure Regulations 2010 (Regulation 122) requires that Section 106 planning obligations must be necessary to make the development acceptable in planning terms, directly related to the development and fairly and reasonable related in scale and kind to the development. Section 106 obligations are intended to make development acceptable which would otherwise be unacceptable in planning terms.
- 9.55 The East of England Ambulance Service NHS Trust (EEAST) state that they require additional resources in order to maintain the Category response times, as the nature of this development is likely to increase the current demand for ambulance calls. EEAST states that the capital required to create additional ambulance services to support the population arising from the proposed development is calculated to be £33,354. EEAST therefore requests that the sum of £33,354 be secured through a planning obligation, which would support the provision of an additional ambulance to meet the expanded demand arising from the proposed development. EEAST states that the development would have an impact on healthcare provision in the area where there is already a deficit of emergency ambulance service; and, if unmitigated, the development would be unsustainable. EEAST states that planning obligations could be used to secure contributions to mitigate these impacts and make an otherwise unacceptable development acceptable in relation to healthcare provision.
- 9.56 In addition, the NHS Cambridgeshire & Peterborough Integrated Care System (CAPICS) state that the proposed development is likely to have an impact on the 3 x GP Practices operating within the vicinity of the application; that there is zero capacity in the Wisbech area to take on additional patients; and that the development would see an increase in patient pressure of circa 244 new residents, which would require additional workforce to support an increase in appointments and a resulting increase in estate demand. CAPICS state that a developer contribution of £87,691.56 will therefore be required to mitigate the impacts of the proposed development. CAPICS requests that this contribution is secured through a planning obligation, with the proposal that the sum be used to fund a project which increases clinical capacity at one of the GP Practices within the vicinity of the development, or any project at an alternative premises in the vicinity of the Practices/development which increases primary healthcare capacity.
- 9.57 The application is not accompanied by a Heads of Terms or any other form of agreement to provide the contributions requested by EEAST and CAPICS.

9.58 The above contributions are considered necessary to make the development acceptable and they meet the tests of CIL regulations in that they are, i) necessary to make the development acceptable in planning terms; ii) directly related to the development; and, iii) fairly and reasonably related in scale and kind to the development.

9.59 It is therefore considered that the application fails to demonstrate that the proposed development would be supported by, and have good access to, sustainable infrastructure provision to support and meet all the requirements arising from the proposed development, contrary to policy LP13 of the Local Plan.

Housing mix

9.60 Policy LP3 of the Local Plan states that development should provide a scale and mix of housing types that will meet the identified need for Fenland (as informed by an up-to-date Cambridge Sub Region Housing Market Assessment (SHMA)) and a range of new job opportunities in order to secure balanced communities.

9.61 The latest SHMA data, contained within the Cambridgeshire and West Suffolk Housing Needs of Specific Groups 2021, suggests the following housing mix for Fenland for the 2020-2040 period:

Size	Market	Affordable homes to buy	Affordable homes to rent
1 bedroom	0-10%	20-25%	35-45%
2 bedrooms	20-30%	35-45%	35-45%
3 bedrooms	40-50%	25-35%	10-20%
4+ bedrooms	20-30%	5-10%	0-10%

9.62 The application does not provide committed details of a specific housing mix. However, the application is accompanied by an indicative Site and Location Plan which illustratively shows the proposed development including 22No. 1-bed flats, 22No. 2-bed flats and 58No. houses (no indicative mix provided).

9.63 It would be necessary for details of housing mix to be secured by a planning condition, in any event of planning permission being granted, in order to ensure compliance with policy LP3 of the Local Plan.

Flood risk and drainage

9.64 The application site is located within Flood Zone 1 (low probability of flooding from rivers and sea) and does not contain any significant areas of flood risk from other sources.

9.65 Policy LP14 of the Local Plan states that all development proposals should adopt a sequential approach to flood risk from all forms of flooding and development in areas known to be at risk from any form of flooding will only be permitted following:

- (a) the successful completion of a sequential test (if necessary), having regard to actual and residual flood risks
- (b) an exception test (if necessary),
- (c) the suitable demonstration of meeting an identified need, and

(d) through the submission of a site specific flood risk assessment, demonstrating appropriate flood risk management and safety measures and a positive approach to reducing flood risk overall, and without reliance on emergency services.

9.66 Policy LP14 of the Local Plan also states that, in addition to the requirements of the NPPF and associated technical guide, all applications for relevant developments must include a drainage strategy to demonstrate that:

- (a) suitable consideration has been given to surface water drainage;
- (b) appropriate arrangements for attenuating surface water run-off can be accommodated within the site; and
- (c) issues of ownership and maintenance are addressed; and for foul drainage private infrastructure managed by residents groups or management companies should be avoided.

Surface water

9.67 The application is accompanied by a Flood Risk Assessment & Sustainable Drainage Strategy.

9.68 The Flood Risk Assessment & Sustainable Drainage Strategy states that the ground conditions within the application site are unsuitable for infiltration drainage and therefore it is proposed that surface water would be likely to be disposed of into an existing watercourse. This follows the surface water drainage hierarchy specified within the Cambridgeshire Flood and Water SPD and therefore is an acceptable means of surface water drainage disposal in principle.

9.69 The Lead Local Flood Authority notes that a half drain time above 24 hours is present at the site with the current proposed drainage infrastructure; however, as additional green open space has been identified for potential extra storage, if the half drain time can't be reduced, this can be offset with the provision of additional attenuation features. On this basis, the Lead Local Flood Authority considers that the information contained within the Flood Risk Assessment & Sustainable Drainage Strategy, demonstrates that there is sufficient space within the proposed development to accommodate necessary drainage infrastructure to manage surface water runoff from the site and they have no objection in principle to the proposed development.

9.70 The Lead Local Flood Authority requests that a condition is imposed requiring a detailed design of the surface water drainage of the site (based upon the principles within the agreed Flood Risk Assessment & Sustainable Drainage Strategy) to be submitted to, and approved by, the Local Planning Authority; and requiring that any elements of the surface water drainage system not adopted by a statutory undertaker be maintained and managed in accordance with a management and maintenance plan to be approved by the Local Planning Authority.

9.71 With consideration given to the recommendations of the Lead Local Flood Authority, and as details of layout are not being committed at this stage, it would be reasonable and necessary to secure a detailed scheme of surface water drainage via a planning condition, in any event of planning permission being granted.

9.72 The application therefore demonstrates that an acceptable surface water drainage scheme can be achieved, in accordance with policy LP14 of the Local Plan, Chapter 14 of the National Planning Policy Framework and guidance contained within the Cambridgeshire Flood and Water Supplementary Planning Document.

Foul water

- 9.73 Anglian Water has stated that there is available capacity to accommodate the foul water flows from the proposed development. However, the application does not provide any details relating to the method of foul water disposal for the proposed development.
- 9.74 It is therefore considered necessary to secure details of foul water drainage via a planning condition, in any event of planning permission being granted.

Trees

- 9.75 Policy LP16 of the Local Plan requires proposals for new development to demonstrate that they retain and incorporate natural features of the site, such as trees.
- 9.76 Due to the length of time which has passed since the original Arboricultural Impact Assessment being prepared, a revised Arboricultural Impact Assessment (AIA) was submitted to the Local Planning Authority in March 2025.
- 9.77 The AIA identifies fifty individual trees and twelve groups of trees of mix species, predominantly comprising Ash, Oak and Poplar, in addition to other smaller species. The boundaries of the application site are predominantly bordered by Poplar.
- 9.78 The AIA indicates that some of the trees within the site would need to be removed in order to accommodate the indicative layout of the proposed development, to gain outside space to some gardens to alleviate shade and proximity issues, and to facilitate construction/demolition activities. The AIA states that, with detailed design, the tree removals could be limited to lower quality trees that would have to be removed for construction/demolition purposes.
- 9.79 The AIA concludes that, overall, there is space to allow construction of the proposal, although some considerations within the detailed design will be required to avoid unnecessary loss of trees throughout the site either by need for construction or by adverse pressure to remove trees by future residents. The AIA recommends that, in any event of planning permission being granted, a condition is appended requiring a further formal implications assessment, method statement and tree protection plan, in order to inform the detailed design proposal at the reserved matters stage.
- 9.80 With consideration given to the conclusions and recommendations of the AIA, the outline nature of the planning application, and the opportunity for a scheme of high quality soft landscaping to be secured by a planning condition in any event of planning permission being granted, it is considered that the proposed development could be accommodated within the application site without having a significant detrimental impact on the arboricultural value of the site.
- 9.81 Although the proposed development would result in some conflict with policy LP16 of the Local Plan as it does not demonstrate retention and incorporation of all existing trees, it would not be reasonable to refuse the planning application on this basis due to the absence of any identified harm to the arboricultural value of the site.

Biodiversity

- 9.82 Policy LP16 of the Local Plan requires development proposals to protect and enhance biodiversity on and surrounding the proposal site, taking into account locally designated sites and the special protection given to internationally and nationally designated sites, in accordance with policy LP19 of the Local Plan.
- 9.83 Policy LP19 of the Local Plan states that the Council will conserve, enhance and promote the biodiversity interest of the natural environment throughout Fenland and, through the processes of development delivery (including the use of planning obligations), will ensure opportunities are taken to incorporate beneficial features for biodiversity in new developments.
- 9.84 The application was originally accompanied by a Preliminary Ecological Appraisal (PEA) which confirms that bat roosts are present within the site.
- 9.85 The application was originally recommended for refusal by Peterborough City Council's Wildlife Officer, in their role as an ecology advisory service to the Local Planning Authority, on grounds that there was insufficient information to make a recommendation. In order to address this, they originally recommended that the site be surveyed using the recommendations provided within the PEA, and a report submitted, in advance of determination of the application. However, following a site visit with the applicant's ecologist and due to the traditional survey method resulting in an extremely heavy survey load, they accepted an alternative survey approach to inform the outline planning only, which would require further surveys works to be undertaken at the detailed planning stage in any event of planning permission being granted.
- 9.86 Subsequently, a Phase 2 Bat Survey report was received during the course of the application. The application was then reviewed by Cambridgeshire County Council Ecology Officer, in their role as an ecology advisory service to the Local Planning Authority, and they stated that the Phase 2 Bat Survey report addressed the original concerns raised by Peterborough City Council's Wildlife Officer. In addition, Fenland District Council Principal Ecologist has also stated that the level of bat survey effort, taken together with the proposals for mitigation measures which would be available for any disturbance to bats, are sufficient to give a level of confidence to the Council that if permission were to be granted to the development the conservation status of bats would be able to be conserved. With consideration given to the recommendations of Cambridgeshire County Council's Ecology Officer and Fenland District Council's Principal Ecologist, it is considered that it would be necessary to secure further bat surveys via a planning condition, in any event of planning permission being granted.
- 9.87 Peterborough City Council's Wildlife Officer and Cambridgeshire County Council's Ecology Officer both requested a Biodiversity Net Gain assessment to establish a minimum of no net loss of biodiversity as a result of the development. A Biodiversity Net Gain assessment has since been received during the course of the application which states that the proposed development would result in a net loss of biodiversity habitat and, in order to accommodate the proposed quantum of development, there is insufficient space within the application site to compensate the habitat loss and provide a net enhancement.
- 9.88 The Biodiversity Net Gain assessment has been reviewed by Fenland District Council's Principal Ecologist, who has advised that the development may need to

purchase off-site Biodiversity Credits from a Habitat Bank since sufficient habitat compensation may not be able to be achieved on-site.

- 9.89 The Local Planning Authority consider that any purchasing of off-site Biodiversity Credits from a Habitat Bank would need to be secured by a legal agreement, in any event of planning permission being granted. However, the application is not accompanied by a Heads of Terms or any other form of agreement to purchase Biodiversity Credits from a Habitat Bank.
- 9.90 The proposed development would therefore result in a net loss of biodiversity habitat and, in order to accommodate the proposed quantum of development, there is insufficient space within the application site to compensate the habitat loss and provide a net enhancement. Furthermore, the application is not accompanied by a Heads of Terms or a legal agreement providing a commitment to secure off-site biodiversity enhancements. The proposed development therefore fails to protect and enhance biodiversity on and surrounding the proposal site, and fails to ensure opportunities are taken to incorporate beneficial features for biodiversity within the development, contrary to policies LP16 and LP19 of the Local Plan.

Biodiversity Net Gain (BNG)

- 9.91 The Environment Act 2021 requires development proposals to deliver a net gain in biodiversity following a mitigation hierarchy which is focused on avoiding ecological harm over minimising, rectifying, reducing and then off-setting. This approach accords with Local Plan policies LP16 and LP19 which outlines a primary objective for biodiversity to be conserved or enhanced and provides for the protection of Protected Species, Priority Species and Priority Habitat.
- 9.92 There are statutory exemptions, transitional arrangements and requirements relating to irreplaceable habitat which mean that the biodiversity gain condition does not always apply. In this instance, a Biodiversity Gain Condition is not required to be approved before development is begun because the application was submitted prior to the requirement for statutory net gain coming into force.

Other matters

Crime prevention

- 9.93 Cambridgeshire Constabulary Designing Out Crime Officer has requested additional information relating to various crime prevention measures. The Local Planning Authority consider that additional information relating to such measures could be requested via planning conditions and informatives, depending on whether they are considered to be necessary to make the development acceptable.

10 PLANNING BALANCE AND CONCLUSIONS

- 10.1 The proposed development would provide additional market housing stock, built to modern construction standards; additional population in the locality who may contribute towards the economic and social sustainability of some local businesses and organisations; and short-term economic benefits during the construction phase, which may support local tradespeople and material suppliers. This carries moderate positive weight based on the quantum proposed.

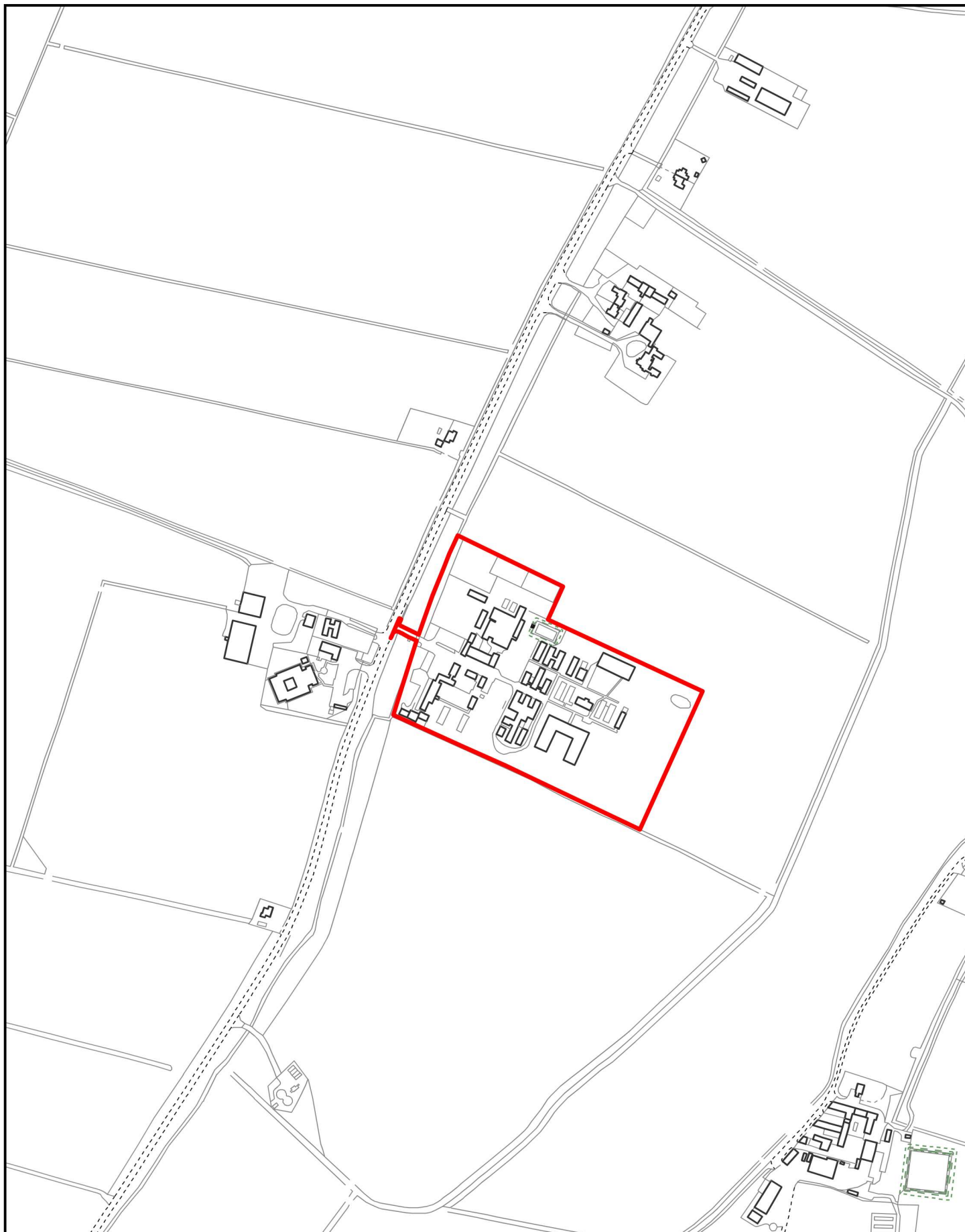
- 10.2 However, on balance, the proposed development would be significantly separated from the built framework of Friday Bridge (contrary to the spatial policies of the Development Plan); would be located in an unsustainable location with inadequate infrastructure to support safe and sustainable travel for future occupiers of the proposed development; would not be supported by, and have good access to, sustainable infrastructure provision to support and meet all the requirements arising from the proposed development; would not provide any affordable housing or a contribution in lieu of affordable housing provision; would cause significant harm to the character and appearance of the area, including the countryside; would cause significant harm (including substantial loss) to a non-designated heritage asset; fails to demonstrate that a high level of residential amenity could be provided to future occupiers of the proposed dwellings; and would fail to protect and enhance biodiversity on and surrounding the site. These issues carry substantial negative weight in the overall planning balance and would clearly not justify the harm to the heritage assets identified elsewhere in this report.
- 10.3 On balance, it is considered that the proposed development would result in significant and demonstrable harm in respect of various material planning considerations, and is in significant conflict with relevant development plan policies, which outweigh the moderate benefits of the application.
- 10.4 As such, in accordance with the statutory duty under Section 38(6) of the Planning and Compulsory Purchase Act 2004, the proposal does not warrant a decision otherwise than in accordance with the development plan and the application should be refused.

11 RECOMMENDATION

Refuse; for the following reasons:

1.	The proposed development is located within an 'Elsewhere' location and is not demonstrably essential to the effective operation of local agriculture, horticulture, forestry, outdoor recreation, transport or utility services; nor is it minerals or waste development. The proposed development would result in a major residential development being located within an unsustainable, countryside location with poor connections to local services and facilities. By virtue of its location, quantum and use, the proposed development would fail to contribute to the sustainability of the settlement and would harm the wider open character of the countryside. The proposed development is therefore contrary to policies LP2 and LP3 of the Fenland Local Plan 2014.
2.	By virtue of its location, quantum and use; and the absence of adequate local pedestrian and cycle infrastructure and public transport facilities to provide sustainable, safe and convenient access to nearby services and facilities; the proposed development would promote unsustainable forms of travel and would result in harm to highway safety, contrary to policies LP2 and LP15 of the Fenland Local Plan 2014 and paragraphs 83, 110, 115 and 116 of the National Planning Policy Framework.
3.	By virtue of its location, quantum and use, the proposed development would result in residential development of a scale and in a location that is not in keeping with the core shape and form of the settlement; would appear significantly at odds with nearby built form; and would significantly urbanise and erode the rural character and appearance of the area including the

	<p>countryside. As such, it is considered that the proposed development fails to respond to the character of the local built environment, would be detrimental to the local distinctiveness of the area, and would adversely impact the character and appearance of the area including the countryside, contrary to policy LP16 of the Local Plan 2014.</p>
4.	<p>The proposed development would cause substantial harm (through substantial loss) to a non-designated heritage asset, which would not be outweighed by the moderate public benefits associated with the proposed development, contrary to policy LP18 of the Fenland Local Plan 2014 and paragraph 216 of the National Planning Policy Framework.</p>
5.	<p>The application fails to demonstrate that the proposed quantum of development could be accommodated within the site without the proposed dwellings and associated gardens being significantly overshadowed by existing trees to be retained. The application therefore fails to demonstrate that a high level of residential amenity could be provided for future occupiers of the proposed development, contrary to policy LP2 of the Fenland Local Plan 2014.</p>
6.	<p>The proposed development would not provide any affordable housing or a contribution in lieu of affordable housing provision, and the application is not accompanied by any evidence to confirm that the proposed development would be unviable with the provision of affordable housing or a financial contribution in lieu of affordable housing provision, contrary to policy LP5 of the Fenland Local Plan 2014.</p>
7.	<p>The application is not accompanied by a Heads of Terms or any other form of agreement to provide the contributions requested by the East of England Ambulance Service NHS Trust (£33,354) and the NHS Cambridgeshire & Peterborough Integrated Care System (£87,691.56), which are considered necessary to make the development acceptable. The application therefore fails to demonstrate that the proposed development would be supported by, and have good access to, sustainable infrastructure provision to support and meet all the requirements arising from the proposed development, contrary to policy LP13 of the Fenland Local Plan 2014.</p>
8.	<p>The proposed development would result in a net loss of biodiversity habitat and, in order to accommodate the proposed quantum of development, there is insufficient space within the application site to compensate the habitat loss and provide a net enhancement. Furthermore, the application is not accompanied by a Heads of Terms or a legal agreement providing a commitment to secure off-site biodiversity enhancements. The proposed development therefore fails to protect and enhance biodiversity on and surrounding the proposal site, and fails to ensure opportunities are taken to incorporate beneficial features for biodiversity within the development, contrary to policies LP16 and LP19 of the Fenland Local Plan 2014.</p>



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F/YR21/0852/O

Scale = 1:5,000





NUMBER OF DWELLINGS

Proposed Houses:	= 58 Units
Long Building:	
1-bed Flats	= 4 Units
2-bed Flats	= 6 Units
Total	= 10 Units
'C' Building:	
1-bed Flats	= 18 Units
2-bed Flats	= 10 Units
Total	= 28 Units
New Block:	
1-bed Flats	= 0 Units
2-bed Flats	= 6 Units
Total	= 6 Units
Proposed Dwellings:	= 44 Units
Total Flats	= 58 Units
Total Houses	= 102 Units

General Notes

1. All dimensions are shown in 'mm' unless otherwise stated.
2. The contractor, sub-contractors and suppliers must verify all dimensions on site prior to the commencement of any work.
3. This drawing is to be read in conjunction with all relevant engineers and specialist sub-contractors drawings and specifications.
4. Any discrepancies are to be brought to the designers attention.

CONSTRUCTION DESIGN & MANAGEMENT REGULATIONS 2015

The following information must be read in conjunction with the project Risk register. This drawing highlights significant design related Health & Safety Risks present during Construction phase, and Residual Risks which remain post completion. Other Health & Safety Risks associated with Construction Activities may be present, and must be identified by the Principal Contractor prior to works commencing. Design Risks relating to specialist design items must be identified by the relevant specialist designers' consultants ad issued to the Principal Designer.

SITE PLAN KEY

- Indicates site access point
- Indicates existing dyke drain
- Indicates proposed house units
- Indicates flats
- Indicates proposed trees
- Indicates parking spaces
- Dotted lines indicates structures to be removed
- Indicates existing boundary hedging
- Indicates proposed 1.8m high close boarded fencing
- Indicates proposed adoptable road with footpaths and grass verge
- Indicates buildings to remain for community use
- Indicates existing trees to remain
- Indicates proposed native hedging

FOR APPROVAL

SWANN EDWARDS
ARCHITECTURE

Swann Edwards Architecture Limited, Swann Edwards Architecture, Black Barn, Ten Road, Gaythorn, Wisbech, Cambs, PE13 4AA
t 01945 450694 e info@swannedwards.co.uk w www.swannedwards.co.uk

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