

**Applicant: Mr Azam
East West Holding Limited**

**Agent : Mr Richard Garnett
ARC Survey & Design Consultants Ltd**

1 - 3 Bridge Street, Wisbech, Cambridgeshire,

F/YR22/0768/F - Change of use from retail and offices to 2 commercial units (use class E) and 33 flats (1-bedroom) with associated alterations and removal of glass roof

F/YR22/0769/LB - Internal and external alterations to a listed building to enable change of use from retail and offices to 2 commercial units (use class E) and 33 flats (1-bedroom) with associated alterations and removal of glass roof

Officer recommendation: Grant

Reason for Committee: Town Council recommendation contrary to Officer recommendation

1 EXECUTIVE SUMMARY

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| 1.1 | This application proposes the use of a vacant listed building situated within the Wisbech Conservation Area. It will deliver a mixed commercial and residential scheme providing 2 ground floor commercial units and 33 units of residential accommodation. |
| 1.2 | Whilst the comments of the Town Council and The Wisbech Society are noted and acknowledged and officers have some sympathy with the points made, so much so that they endeavoured to secure scheme revisions in this regard. It must be noted that there would be no policy basis to withhold consent in this regard noting the absence of significant harm arising by virtue of the quantum of units. Furthermore, when giving weight to the reuse of this prominent heritage asset and noting the absence of any other material considerations which would indicate that the scheme should be resisted matters of 'amount' must fall away. |
| 1.3 | The application is recommended for approval as set out in the body of the report below having due regard to the duty in law under S16 Planning (Listed Buildings and Conservation Areas) Act 1990 and also the requirements of the National Planning Policy Framework 2021 and Policy LP18 of the Fenland Local Plan 2014. |
| 1.4 | Matters of flood risk, highways, residential amenity, security and servicing have also been considered alongside heritage and character considerations, with the Conservation Officer having also inputted into the latest iteration of the scheme and their suggestions incorporated. |
| 1.5 | It is considered that the scheme on balance aligns with the relevant policy framework and may be favourably recommended with appropriate conditions. |

2 SITE DESCRIPTION

- 2.1 The application site is located in Wisbech town centre. It comprises the former Post Office building on Bridge Street and the former telephone exchange building on Alexandra Road. The site comprises two separate but linked buildings. The former Post Office building which dates to the 19th century has a three-storey frontage to Bridge Street and side elevation facing Post Office Lane which lies to the east. The former telephone exchange building dates from the 1970s and comprises a four-storey building with frontage to Post Office Lane and Alexandra Road which lies to the south of Bridge Street.
- 2.2 The site lies within the Wisbech Conservation Area. The former post office building is Grade II Listed. To the east of the site along the frontage of York Row there are numerous listed buildings in mixed use and to the north is the Clarkson Memorial a Grade II* Listed building along with the Grade II Listed Wine Vaults. Alexandra Road lies to the south with pedestrian access through to the Somers Road car park. Further commercial/mixed use buildings lie to the east.
- 2.3 The whole site lies within the designated Primary Shopping Area (PSA) and the frontage to Bridge Street within the Primary Shopping Frontage (PSF)
- 2.4 The site lies in Flood Zone 1 but immediately adjacent to Flood Zone 3, with a small section of its south-western corner falling within Flood Zone 3.

3 PROPOSAL

- 3.1 This application seeks full planning permission for the change of use of the building from retail/ offices falling within use Class E, to a mixed commercial (Class E) /residential use. It is proposed to retain two commercial units on the ground floor fronting Bridge Street. The remainder of the building will be converted to 33 one bedroomed apartments; scheme was originally for 34 units but following input from Conservation Officer there was a slight reworking of the floor plan, particularly where it impacted on the main rooms on the first and second floors of the Post Office.
- 3.2 Also on the ground floor will be a communal bin store and cycle store. Residents will have access to the internal courtyard. Minor internal alterations are proposed to facilitate the conversion including new partition walls.
- 3.2 A parallel application for Listed Building Consent has been submitted for the physical works and is also considered as part of this report.
- 3.3 A structural survey report accompanies the submission along with a heritage statement and Schedule of Works relating to the listed part of the building.
- 3.4 During the evaluation of the scheme the case officer queried the internal spaces of the units and suggested that the internal layout be reconsidered to increase floor spaces in line with the national space standards; whilst minor revisions were secured increasing the size of some units and a reduction from 34 to 33 units the agent highlights that the resultant accommodation proposed is as follows:

'Our smallest units are 21sq.m, 22sq.m, 25sq.m and 27sq.m and 24sq.m. Then we have 4 units between 31 and 37sq.m, and the remainder exceed 37sq.m.'

Notwithstanding the above the accommodation shown on the drawings is as follows:

- 10 units out of the 33 being under 37 square metres
- 23 at 37 square metres or over

Within the assessment section of this report this aspect of the scheme is further considered.

3.5 Full plans and associated documents for these applications can be found at:
<https://www.publicaccess.fenland.gov.uk/publicaccess/simpleSearchResults.do?action=firstPage>

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4 SITE PLANNING HISTORY

F/YR17/0006/F	Change of Use of Ground Floor Only from Post Office (A1) to Recruitment Office (A2) Wisbech Post Office, 1 Bridge Street, Wisbech	Granted 27.02.2017
F/YR15/0159/LB	Relocation of existing war memorial plaque from Wisbech Post Office to Royal Mail Sorting Office, Cromwell Court, 26 Enterprise Way, Wisbech Wisbech Post Office, 1 Bridge Street, Wisbech	Refused 24.04.2015
F/YR14/0955/LB	Relocation of existing war memorial plaque from Wisbech Post Office to Royal Mail Sorting Office, Cromwell Court, 26 Enterprise Way, Wisbech Wisbech Post Office, 1 Bridge Street, Wisbech	Refused 23.01.2015
F/YR14/0600/F	Change of use from B1 Office to D1 Training Centre Suite 6, Exchange Tower, Post Office Lane, Wisbech	Granted 10.09.2014
F/YR14/0254/LB	Internal and external alterations Wisbech Post Office, 1 Bridge Street, Wisbech	Granted 23.07.2014
F/YR09/0603/A & F/YR09/0604/LB	Display of 1 no non-illuminated external mounted service panel and 1 no non-illuminated hanging sign (retrospective)	Granted 18.11.2009
F/YR05/0886/F & F/YR05/0887/LB	Installation of 1 external condenser to wall on first-floor Wisbech Post Office, 1-3 Bridge Street, Wisbech	Granted 28.09.2005
F/YR04/4382/LB	Display of non-illuminated lettering and 2 hanging signs 2-3 Bridge Street, Wisbech	Granted 14.01.2005

F/YR04/3958/FDC & F/YR04/3959/LB	External alterations to front elevation 2-3 Bridge Street, Wisbech	Withdrawn 05.10.2004
F/YR03/1561/LB	Internal and external alterations to form new entrance on Post Office Lane	Granted 12.05.2004
F/YR01/1167/F	Erection of extensions to provide additional office accommodation comprising second- floor accommodation in part, second and third-floor accommodation in part and pedestrian walkway at second-floor level	Granted 28.01.2002
F/YR01/1168/LB	Erection of extensions to provide additional office accommodation comprising second- floor accommodation in part, second and third-floor accommodation in part and pedestrian walkway at second-floor level	Granted 28.01.2002

5 CONSULTATIONS

5.1 Town Council

(19.07.2022) *'Object, on the basis that the proposal would constitute overdevelopment of the site'*

5.2 Cambridgeshire County Council Highways Authority

(18.08.2022) *'Highways have no objections on the application. LPA should ensure the provision of cycle stands should meet the FDC standards.'*

5.3 LB Application: Historic England (21.07.2022)

HE provides advice when our engagement can add most value. In this case we do not wish to offer advice. This should not be interpreted as comment on the merits of the application. We suggest that you seek the views of your specialist conservation and archaeological advisers. You may also find it helpful to refer to our published advice [...]. It is not necessary to consult us on this application again, unless there are material changes to the proposals. However, if you would like advice from us, please contact us to explain your request.'

5.4 LB Application: FDC Conservation Officer (26.08.2022)

'1. This application concerns internal and external alterations to a listed building to enable the change of use from retail and offices to 2 commercial units (use class E) and 34 x 1-bedroom flats with associated alterations and removal of a glass roof. The Post Office (located within No 1 Bridge Street) was purpose built, dates from 1887 and is grade II listed. The building retains its historic "POST OFFICE" metal lettering, which contributes to the architectural interest of the buildings, as well as the war memorial which is firmly set into the west wall of the ground floor room. It is assumed that it commemorates men which worked within Wisbech & District Postal Service and most likely worked from this building. To this extent it connects the men which have fallen to this particular historic post office building as it was their place of work. The memorial is considered to be part of the architectural and historic history of this listed building. There is therefore a presumption against seeing either of these elements removed from the property. The remainder of the site encompasses the former sorting office and later tourist/council information centre to the west, and the former telephone exchange building to the rear, facing onto Post Office Lane, and Alexandra Road, (forming No 3 Bridge Street) form part of the application. The site is

within Wisbech Conservation Area, and within the setting of neighbouring and adjacent listed buildings and structures. The majority of the building has been vacant for some time, with only the ground floor Post Office area being occupied until recently.

- 2. Consideration is given to the impact of the proposal on the architectural and historic interests with special regard paid to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses according to the duty in law under S16 of the Planning (Listed Buildings and Conservation Areas) Act 1990.*
- 3. Consideration is given to the impact of the proposal on the architectural and historic interests of a listed building with special regard paid to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses according to the duty in law under S66 Planning (Listed Buildings and Conservation Areas) Act 1990.*
- 4. Consideration is given to the impact of this proposal on the character and appearance of Wisbech Conservation Area with special attention paid to the desirability of preserving or enhancing the character or appearance of that area according to the duty in law under S72 Planning (Listed Buildings and Conservation Areas) Act 1990.*
- 5. Comments are made with due regard to Section 16 of the National Planning Policy Framework 2021, specifically paragraphs 8, 195, 197, 199, 200, and 202.*
- 6. A heritage statement has been submitted with the application. The information is sufficient to comply with paragraph 189 of the NPPF and policy LP18 of the 2014 local plan. In addition to this the Draft Fenland Local Plan (2022) was published for consultation on 25th August 2022, the first stage of the statutory process leading towards the adoption of the Plan. Given the very early stage which the Plan is therefore at, it is considered, in accordance with Paragraph 48 of the NPPF, that the policies of this should carry extremely limited weight in decision making. Of relevance to this application is Policy LP23.*
- 7. Due regard is given to relevant planning history. There is an extensive planning history of over 30 applications associated with the building. From this information the recent history of the building can be appreciated. It is evident that the Post Office itself once had a sorting office attached to it in adjoining buildings, but the sorting office closed circa 1994 and converted to offices in the following years (see apps F/95/0303/F and 98/0127/LB). At the time the sorting office closed the whole building was sold off by Royal Mail although Post Office Counters Ltd continued to operate their business from the property under lease until it relocated. More recent Listed Building Consent applications (F/YR14/0955/LB and F/YR15/0159/LB) have focused on the removal of a war memorial from this building, and these were refused. Most recently, an application (F/YR170006/F, for use as a recruitment office in the former post office space, was approved. This use has recently ceased and the whole building now lies vacant.*

8. *There is no objection to this application. However, the following comments are made:*

*i. The Post Office was built in 1887 in the 'French Mediaeval Domestic Style'. It is visually striking with its red brick walls and moulded and arched limestone dressings round doors and windows and parapet gables with finials, and slate roof. It retains all its original joinery and rainwater goods and these details and architectural design contribute greatly to its special interest and to the character and appearance of the conservation area. Internally, it retains original joinery to doors and windows, with the windows retaining interesting pulley and spring opening system with pull cords and wooden toggles. The north first floor room retains an original safe with shelving and parquet flooring (which may well extend below the current carpet in the main room). The original ceiling with coving survives above the current suspended ceiling. Early heating systems (radiators and piping) indicate a possible contemporary heating system (further research would be needed), but certainly are part of the story of the building. Elsewhere in the same room two internal windows form a part glazed partition to the rear, with historic linoleum flooring. Throughout the rest of the building, banisters and balustrade survive to all staircases (iron in the basement, iron balusters with timber handrail to first floor and all timber to second floor), with a largely unaltered layout. Historic England archive mapping indicates that the front bay of the building is covered by the extent of listing – the remainder may be considered as curtilage due to its attachment (but further research would be needed with regards to use and relationship), but regardless, it is clear that the rear wing is of less significance. However, local report has it that a rear bay facing onto Alexandra Road, may have an original turntable set into the ground for the post-vans. **It is within this context that this proposal is considered.***

9. *The proposal seeks to convert the building to 34 single-bed units. Whilst the number of apartments on this scale may not be the most conducive to attracting settled residents and contributing to the economic regeneration of Wisbech (larger 2-3 bed family apartments would be preferable for this), it is not considered that single bed units will impact on the character and appearance of the conservation area, per se, especially given that the exterior of the building, including all windows and joinery will remain unaltered.*
10. *However, concerns are raised with regards to the usual downward trajectory of maintenance and condition of buildings with this level of subdivision. Rainwater goods and joinery are often neglected, and a building then quickly deteriorates resulting in considerable harm to the special interest of historic buildings and conservation area. Whilst this is not something that can be conditioned against, it should be borne in mind when making a recommendation on this application.*
11. *Comments are limited to the impact on the designated part of the building that has the most significance, namely the original Post Office section of the building to first, second and third floors. There has been some informal discussion with the agent resulting in some alteration to the scheme, and it is felt that the scheme now represents an acceptable compromise.*

12. *There is no proposed change to or use for the basement. The ground floor, the current post office space will have the modern counter removed (care should be taken in case of historic ceilings above or floor finishes below – all historic fabric will be protected by the listing and should be repaired on a like-for-like basis) and will remain a commercial/retail space. The door to the rear, leading to a lobby is to be infilled (this is reversible), thereby separating the commercial space from the residential units behind and above. Access to the residential units will be from Post Office Lane. The lobby area contains a safe and this is to remain in situ. There is to be no alteration the lobby area, doors or stairs leading down to the basement or up to the first floor. (Revised drawing P100C 27th July 2022).*
13. *To the first floor, the existing wc on the landing is to become a store for flat 20, with the door retained. Double doors off the landing lead into a small cupboard area. These are to be removed and blocked up, with the back of the cupboard wall being removed, and the space reunited with the glazed partition area in the main room. The door to the north-east room (currently forming a kitchenette) will provide new independent access to a 2-bedroom flat. A new partition wall within this space will create a single bedroom, and entrance hall and a reinstated doorway will provide access to the main room. The main room is awkwardly subdivided to create a second bedroom, bathroom (current door to main room blocked up), living room and dining area, with the kitchen area to be created out of the rear glazed partition (lino to be protected with overboarding), and while a single-bed apartment would reduce the need for partitions, and improve the layout (e.g. the single bedroom could be the bathroom), these partitions are all reversible, and therefore felt to be acceptable on the basis that a viable use will outweigh the less than substantial harm. The existing safe will form a cupboard to the bedroom. The shelves are to remain. Nb. The existing floor plan omits the staircase leading from first to second floor. (Revised drawing P200A 27th July 2022).*
14. *The second floor follows a similar pattern with an existing wc on the stairs landing to be a cupboard, and the main room to form kitchen-living room, bedroom and bathroom with new internal partitions. To the rear, a corridor currently leads to the rest of the building, but this is to be blocked off with a solid wall and form a cupboard, thereby creating a discrete pair of apartments to first and second floor that can't be accessed from the rest of the building (Drawing P300A 27th July 2022).*
15. *The remainder of the building does not contain or retain anything of historic significance (bar historic windows), and therefore the level of subdivision is not felt to impact on the special interest of the building, as all is reversible.*
16. *Overall, however, all works should take care when installing partition walls with regards to impact on historic ceilings and floors. Insulation and any boarding to external walls to be suitable for use with historic fabric and other works to be in accordance with the submitted schedule of works.*
17. *The impact on the building overall is felt to be neutral and on the listed part/areas of significance, the works are reversible and outweighed by the public benefit of this building being found a viable use in principle, bearing in mind the concerns regarding condition as raised above.*

1. CONDITIONS (S.17 of the law for LBs).

- i. *The location and type of any external services, vents, svps, etc, shall be submitted to and approved in writing by the local authority to ensure that their installation/location shall not negatively impact the special interest of the listed building.*

Recommendation: Do not object subject to condition'.

5.5 **The Wisbech Society (27.07.2022)**

With reference to the above Planning Application, the Wisbech Society OBJECTS to the proposals, for the following reasons.

- 1. There is no reference to the protections afforded to the two War Memorials within the property. There has been in the recent past two applications to remove the memorials, both of which were REFUSED by Planners.*
- 2. There is no reference to the vehicle turntable that is located within the property. This is an historic and unusual feature, installed to allow post office vehicles to access a restricted space, be loaded/unloaded, and enable the vehicle to be rotated so as to safely exit the building. The turntable is currently concealed beneath a false floor for its protection.*
- 3. Although there is mention of plans to conceal some historic wallplaster, ceilings and cornice, there is no clear intention to ensure that the new stud walls and suspended ceilings use fittings that protect the historic fabric from damage or future deterioration. It is important that all historic fabric is protected.*
- 4. Concerns have been raised regarding the number of very small units planned - some are not much larger than ~20m², which doesn't allow for sufficient living space that could be described as a starter home. The warren of corridors may also become a fire hazard and prevent quick egress in an emergency.*
- 5. The number of units proposed will have a detrimental affect on amenity in the town centre Conservation Area and will affect the setting of nearby Listed Buildings; and could cause issues with waste disposal, noise and parking (parking in the immediate area is designed for local business and visitors to local shops - not residential use and there is no guarantee that parking will remain free). There is also concern that the water and sewerage system will be unable to cope with this many new units.*

5.6 **Environment Agency**

'We have no objection to this planning application, providing that you have taken into account the Flood Risk considerations which are your responsibility. We have provided additional information below.

Flood Risk

Part of the site is located within flood zone 3 as defined by the 'Planning Practice Guidance: Flood Risk and Coastal Change' as having a high probability of flooding.

We have no objection to this application, but strongly recommend that the mitigation measures proposed in the submitted Flood Risk Assessment (FRA) undertaken by Ellingham Consulting LTD, Ref: ECL0790/ARC SURVEY &

DESIGN CONSULTANTS dated June 2022 and the mitigation measures detailed in section 5.2 of the FRA :

- Finished Floor Level of the ground floor residential units to be no lower than 300mm above the existing ground level with 0.3m of flood resilient construction above the FFL.*
- No living accommodation on basement level are fully implemented and retained for the life of the development*

Informatives

The emergency flood plan will need careful consideration. We do not normally comment on or approve the adequacy of flood emergency response procedures accompanying development proposals, as we do not carry out these roles during a flood. Our involvement with this development during an emergency will be limited to delivering flood warnings to occupants/ users covered by our flood warning network.

The planning practice guidance (PPG) to the National Planning Policy Framework (NPPF) states that, in determining whether a development is safe, the ability of residents and users to safely access and exit a building during a design flood and to evacuate before an extreme flood needs to be considered. One of the key considerations to ensure that any new development is safe is whether adequate flood warnings would be available to people using the development.

In all circumstances where warning and emergency response is fundamental to managing flood risk, we advise local planning authorities to formally consider the emergency planning and rescue implications of new development in making their decisions. As such, we recommend you refer to 'Flood risk emergency plans for new development' and undertake appropriate consultation with your emergency planners and the emergency services to determine whether the proposals are safe in accordance with paragraph 163 of the NPPF and the guiding principles of the PPG. Flood resistance and resilience - advice to LPA/applicant

We strongly recommend the use of flood resistance and resilience measures. Physical barriers, raised electrical fittings and special construction materials are just some of the ways you can help reduce flood damage.

To find out which measures will be effective for this development, please contact your building control department. If you'd like to find out more about reducing flood damage, visit the Flood Risk and Coastal Change pages of the planning practice guidance. Further guidance on flood resistance and resilience measures can also be found in Government guidance on flood resilient construction [link quoted] and CIRIA Code of Practice for property flood resilience [again link quoted].

Other advice:

Sequential Test / and Exception Tests

The requirement to apply the Sequential Test is set out in Paragraph 162 of the National Planning Policy Framework. The Exception Test is set out in paragraph 164. These tests are the Councils responsibility and should be completed before the application is determined.'

5.7 CCC (Lead Local Flood Authority)

(27.07.2022) *'The application is for a change of use only. Whilst this proposal will not result in an increase in impermeable area; in accordance with Chapter 6 of the Flood & Water Supplementary Planning Document we still strongly encourage the use of sustainable drainage techniques (SuDS) to take account of the effects of climate change. SuDS are an approach to managing surface water run-off which seeks to mimic natural drainage systems and retain water on or near the site as opposed to traditional drainage approaches which involve piping water off site as quickly as possible. SuDS offer significant advantages over conventional piped drainage systems in reducing flood risk by attenuating the rate and quantity of surface water run-off from a site, promoting groundwater recharge, and improving water quality and amenity.'*

5.8 Anglian Water Services Ltd

(25.07.2022) *'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. Anglian Water would ask that the following text be included within your Notice should permission be granted.'*

Anglian Water has assets close to or crossing this site or there are assets subject to an adoption agreement. Therefore, the site layout should take this into account and accommodate those assets within either prospectively adoptable highways or public open space. If this is not practicable then the sewers will need to be diverted at the developers cost under Section 185 of the Water Industry Act 1991. or, in the case of apparatus under an adoption agreement, liaise with the owners of the apparatus. It should be noted that the diversion works should normally be completed before development can commence.

Wastewater Treatment - The foul drainage from this development is in the catchment of West Walton Water Recycling Centre that will have available capacity for these flows

Used Water Network - This response has been based on the following submitted documents: Application form, Site Location Plan, Drainage Strategy, Flood risk Assessment Development will lead to an unacceptable risk of flooding downstream. Anglian Water will need to plan effectively for the proposed development, if permission is granted. We will need to work with the applicant to ensure any infrastructure improvements are delivered in line with the development. A full assessment cannot be made due to lack of information, the applicant has not identified a point of connection into the public system, or a discharge regime (pump or gravity), if pumped a rate is required so that we can accurately assess our network. We therefore request a condition requiring an on-site drainage strategy [requests informatives].

Surface Water Disposal - The preferred method of surface water disposal would be to a sustainable drainage system (SuDS) with connection to sewer seen as the last option. Building Regulations (part H) on Drainage and Waste Disposal for England includes a surface water drainage hierarchy, with infiltration on site as the preferred disposal option, followed by discharge to watercourse and then connection to a sewer.

The preferred method of surface water disposal would be to a sustainable drainage system SUDS with connection to the sewer seen as the last option.

The surface water strategy/flood risk assessment submitted with the planning application relevant to Anglian Water is unacceptable due to it not being clear whether a surface water connection will be utilised, if it is we would require a point of connection and discharge rate. We would therefore recommend that the applicant consults with Anglian Water and the Environment Agency.

We request a condition be applied to the decision notice if permission is granted. The purpose of the planning system is to achieve sustainable development. This includes the most sustainable approach to surface water disposal in accordance with the surface water hierarchy. It is important to explain that the volume arising from surface water flows can be many times greater than the foul flows from the same development. As a result they have the potential to draw substantially on the public sewerage network capacity and capacity at the receiving Water Recycling Centre.

If developers can avoid new surface water flows entering the public sewerage, the impact of developments on wastewater infrastructure and the risk and impact of sewer flooding can be managed effectively, in accordance with paragraph 163 of the NPPF, minimise the risk of flooding. It is appreciated that surface water disposal can be dealt with, in part, via Part H of the Building Regulations, it is felt that it is too late at this stage to manage any potential adverse effect. Drainage systems are an early activity in the construction process and it is in the interest of all that this is dealt with early on in the development process. As our powers under the Water Industry Act are limited it is important to ensure appropriate control over the surface water drainage approach is dealt with via a planning condition, ensuring that evidence is provided that the hierarchy has been followed and any adverse impacts and mitigation required can be planned for effectively

Trade Effluent - The planning application includes employment/commercial use. To discharge trade effluent from trade premises to a public sewer vested in Anglian Water requires our consent. It is an offence under section 118 of the Water Industry Act 1991 to discharge trade effluent to sewer without consent. Anglian Water would ask that the following text be included within your Notice should permission be granted. "An application to discharge trade effluent must be made to Anglian Water and must have been obtained before any discharge of trade effluent can be made to the public sewer. Anglian Water recommends that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of such facilities could result in pollution of the local watercourse and may constitute an offence. Anglian Water also recommends the installation of a properly maintained fat traps on all catering establishments. Failure to do so may result in this and other properties suffering blocked drains, sewage flooding and consequential environmental and amenity impact and may also constitute an offence under section 111 of the Water Industry Act 1991."

Suggested Planning Conditions

Anglian Water would therefore recommend the following planning condition if the Local Planning Authority is mindful to grant planning approval.

Used Water Sewerage Network - We have no objection subject to the following condition:

Condition

Prior to the construction above damp proof course, a scheme for on-site foul water drainage works, including connection point and discharge rate, shall be submitted to and approved in writing by the Local Planning Authority. Prior to the occupation of any phase, the foul water drainage works relating to that phase must have been carried out in complete accordance with the approved scheme.

Reason

To prevent environmental and amenity problems arising from flooding

Surface Water Disposal

No drainage works shall commence until a surface water management strategy has been submitted to and approved in writing by the Local Planning Authority. No hard-standing areas to be constructed until the works have been carried out in accordance with the strategy

For the attention of the Applicant

Next steps

Desktop analysis has suggested that the proposed development will lead to an unacceptable risk of flooding downstream. We therefore highly recommend that you engage with Anglian Water at your earliest convenience to develop in consultation with us a feasible drainage strategy.

If you have not done so already, we recommend that you submit a Pre-planning enquiry with our Pre-Development team. This can be completed online at our website <http://www.anglianwater.co.uk/developers/pre-development.aspx>

Once submitted, we will work with you in developing a feasible mitigation solution. If a foul or surface water condition is applied by the Local Planning Authority to the Decision Notice, we will require a copy of the following information prior to recommending discharging the condition:

Foul water:

- *Feasible drainage strategy agreed with Anglian Water detailing the discharge solution including:*
 - *Development size*
 - *Proposed discharge rate (Should you require a pumped connection, please note that our minimum pumped discharge rate is 3.8l/s)*
 - *Connecting manhole discharge location (No connections can be made into a public rising main)*
 - *Notification of intention to connect to the public sewer under S106 of the Water Industry Act (More information can be found on our website)*
 - *Feasible mitigation strategy in agreement with Anglian Water (if required)*

Surface water:

- Feasible drainage strategy agreed with Anglian Water detailing the discharge solution, including:
- Development hectare size
- Proposed discharge rate (Our minimum discharge rate is 2l/s. The applicant can verify the site's existing 1 in 1-year greenfield run off rate on the following HR Wallingford website -<http://www.uksuds.com/drainage-calculation-tools/greenfield-runoff-rate-estimation>. For Brownfield sites being demolished, the site should be treated as Greenfield. Where this is not practical Anglian Water would assess the roof area of the former development site and subject to capacity, permit the 1 in 1-year calculated rate)
- Connecting manhole discharge location
- Sufficient evidence to prove that all surface water disposal routes have been explored as detailed in the surface water hierarchy, stipulated in Building Regulations Part H (Our Surface Water Policy can be found on our website)'

5.9 **FDC Head of Environmental Services**

Initially requested further details on the bin store to show that it is of suitable size and specification (quoted in response). Queried arrangements for the two commercial units. Following the submission of updated details provided comments as follows (13.01.2023)

'Plans for the bin store indicate the 10 x 1100 bins could be accommodated with sufficient space around to allow collections to take place. These arrangements would be acceptable providing requirements previously mentioned on the attached were carried out i.e. keypad entry, dropped kerb, door hooks etc.'

5.10 **FDC Environment & Health Services (FDC)**

(20.07.2022) *'I refer to the above application for consideration and make the following observations. The Environmental Health Team note and accept the submitted information and have 'No Objections' to the proposal, as it is unlikely to have a detrimental effect on local air quality or be affected by ground contamination.*

Whilst I note the intended workings times provided on the Construction Management Plan (CMP), in the interests of amenity protection this service requests the following condition is imposed as is typical for a development of this nature. The condition reduces proposed possible working times on a weekend from those stated within the CMP.

NOISE CONSTRUCTION HOURS - *No construction or demolition work shall be carried out and no plant or power operated machinery operated other than between the following hours: 08:00 hours and 18:00 hours on Monday to Friday, 08:00 hours and 13:00 hours on Saturday and at no time on Sundays, Bank or Public Holidays, unless otherwise previously agreed in writing with the Local Planning Authority.*

I would also recommend that work is undertaken to ascertain whether any asbestos containing materials are present. If confirmed, then the following can be conditioned

ASBESTOS REMOVAL - *Parts of the existing building with known asbestos containing materials such should be removed only by a licensed asbestos removal contractor and taken to a waste disposal facility, which is licensed to*

receive such waste. A method statement and work plan should also be submitted to Fenland District Council and approved before any work in connection with this aspect of the development is commenced.'

5.11 Cambridgeshire Constabulary - Designing Out Crime Officers

'Thank you for the opportunity to comment on this application. I have viewed the documents in relation to crime, disorder and the fear of crime and completed a search of the Constabulary crime systems for the Medworth Ward covering the last 2 years. I would consider this to be an area of medium vulnerability to crime at present. There have been 2244 crimes recorded in total during this period, those most relevant to new developments are listed as follows: -

16 x dwelling burglary

71 x vehicle crimes (34 theft from and 37 theft of)

85 x cycle thefts

204 x criminal damage offences

264 x public order offences

46 x drug offences (36 possession and 10 trafficking)

There have also been 14 anti-social behaviour incidents recorded.

There is no specific section in the Design and Access/Planning statement relating to security or crime prevention measures.

NPPF Para. 130f states: - Planning policies and decisions should ensure that developments create places that are safe, inclusive, and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

While this is a Grade2 listed building within a conservation area, it is important that security and crime prevention are considered at the early stages of design in relation to the security of the buildings, access control ensuring that only authorised staff and residents are allowed access, cycle and bin store security, mail delivery, lighting, and CCTV where it is being proposed. This office would be happy to discuss security and measures to reduce crime and the fear of crime with the applicants. I have no further comment at this stage'.

5.12 Section 106 Services (PCC)

(29.11.2022) *'I have reviewed the planning statement submitted for F/YR22/0768/F.*

In relation to the claim for the application of Vacant Building Credit, where the GIA of the floorspace that is to be brought back into use is equal to or greater than the GIA of the existing building, the Affordable Housing requirement is zero, providing that the building has not been abandoned, made vacant for the sole purpose of development or is subject to an extant or recently expired planning permission for the same or substantially the same development, none of which apply to this application, and I therefore accept that Vacant Building Credit is applicable to the proposed development.

Also, mindful of the Local Plan Viability Assessment, it is accepted that nil S106 contributions should be requested, and that no viability evidence is needed from the applicant in respect of these matters.'

5.13 **Cambridgeshire County Council (Growth & Economy)**
(08.07.2022) *'I can confirm that the County Council will not seek developer contributions towards libraries or education infrastructure from this development.'*

5.14 **Housing Strategy (PCC)**

(22.07.2022) Made comments outlining the policy requirements for affordable housing resulting from this proposal. Supplementary to these comments advised:

'I understand that a viability assessment has been submitted as part of this planning application. I further understand that it is currently being considered by the appropriate officer. If the viability assessment demonstrates that it is not viable to provide on or an offsite contribution of affordable housing as part of this scheme in this instance, I have no further comments to make. However, in the event that it is concluded that the provision of affordable housing is viable, our Housing needs Policy provisions in my original comments from 9th May 2022 still apply.'

5.15 **NHS (Cambridgeshire and Peterborough Integrated Care System (CAPICS))**

(09.09.2022) *'Thank you for consulting Cambridgeshire and Peterborough Integrated Care System (CAPICS) on the above planning application. I refer to the above planning application and advise that, further to a review of the applicants' submission, the following comments are with regard to the primary healthcare provision on behalf of CAPICS.'*

The proposed development is likely to have an impact on the services of the GP Practice operating within the vicinity of the application site Wisbech Practices: Trinity Practice, North Brink and Clarkson. These practices have a combined registered patient list size of 43,284 and this development of 34 dwellings would see an increase patient pressure of 34 new residents which would require additional GP/Nurse / (Admin support) workforce to support increase in appointments : GP = 0.02 / Nurse = 0.01 and Admin = 0.03 with a resulting increase on estate demand of 2.30 sqm net internal area.*

**Model evidence from Cambridge Analytics data*

A developer contribution will be required to mitigate the impacts of this proposal. CAPICS calculates the level of contribution required, in this instance to be £8,414.21. Payment should be made before the development commences. CAPICS therefore requests that this sum be secured through a planning obligation linked to any grant of planning permission, in the form of a Section 106 planning obligation.

In its capacity as the healthcare provider, CAPICS has identified that the development will give rise to a need for additional primary healthcare provision to mitigate impacts 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, CAPICS 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.

The terms set out above are those that CAPICS deem appropriate having regard to the formulated needs arising from the development. CAPICS are satisfied that the basis and value of the developer contribution sought is consistent with the policy and tests for imposing planning obligations set out in the NPPF.'

5.16 Local Residents/Interested Parties

None

6 STATUTORY DUTY

- 6.1 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).
- 6.2 Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 require Local Planning Authorities when considering development to pay special attention to preserving a listed building or its setting and to the desirability of preserving or enhancing the character or appearance of a conservation area.
- 6.3 Section 16 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires Local Planning Authorities in considering whether to grant listed building consent for any works to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

7 POLICY FRAMEWORK

7.1 National Planning Policy Framework (NPPF)

Para. 8 – make provision for a sufficient range and number of homes, fostering well-designed places, protecting and enhancing the natural, built and historic environment and making the effective use of land

Para. 86 (f) – recognising the role of appropriate housing in town centres contributing to their vitality

Chapter 9 – Promoting sustainable transport

Para. 120 (d) - Promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure)

Para. 126 – Achieving well-designed places. Good design is a key aspect of sustainable development: Creates better places in which to live and work and helps make development acceptable to communities

Para.130 – Design – Should function well, be visually attractive as a result of good architecture and attractive landscaping and be sympathetic to local character and history and establish or maintain a strong sense of place

Chapter 14. Meeting the challenge of climate change, flooding and coastal change

Para. 164 - The application of the exception test

Para. 188 - The focus of planning policies and decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes). Planning decisions should assume that these regimes will operate effectively

Chapter 16 -The Historic Environment – The desirability of new development making a positive contribution to local character

Para. 197 - In determining planning applications LPAs 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.

Para. 202 - Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

7.2 **National Planning Practice Guidance (NPPG)**

Determining a Planning Application

Paras. 3 to 5 – Applying conditions, 6 tests

Para. 26 - National policy provides an incentive for brownfield development on sites containing vacant buildings. Where a vacant building is brought back into any lawful use, or is demolished to be replaced by a new building, the developer should be offered a financial credit equivalent to the existing gross floorspace of relevant vacant buildings when the local planning authority calculates any affordable housing contribution which will be sought. Affordable housing contributions may be required for any increase in floorspace.

Para. 27 - Where there is an overall increase in floorspace in the proposed development, the local planning authority should calculate the amount of affordable housing contributions required from the development as set out in their Local Plan. A 'credit' should then be applied which is the equivalent of the gross floorspace of any relevant vacant buildings being brought back into use or demolished as part of the scheme and deducted from the overall affordable housing contribution calculation. This will apply in calculating either the number of affordable housing units to be provided within the development or where an equivalent financial contribution is being provided.

The existing floorspace of a vacant building should be credited against the floorspace of the new development. For example, where a building with a gross floorspace of 8,000 square metre building is demolished as part of a proposed development with a gross floorspace of 10,000 square metres, any affordable housing contribution should be a fifth of what would normally be sought.

Para. 28 - The vacant building credit applies where the building has not been abandoned.

The courts have held that, in deciding whether a use has been abandoned, account should be taken of all relevant circumstances, such as:

- the condition of the property
- the period of non-use
- whether there is an intervening use; and
- any evidence regarding the owner's intention

Each case is a matter for the collecting authority to judge.

The policy is intended to incentivise brownfield development, including the reuse or redevelopment of empty and redundant buildings. In considering how the vacant building credit should apply to a particular development, local planning authorities should have regard to the intention of national policy.

In doing so, it may be appropriate for authorities to consider:

- whether the building has been made vacant for the sole purposes of re-development
- whether the building is covered by an extant or recently expired planning permission for the same or substantially the same development

Paragraph 033 - The Sequential Test does not need to be applied for applications for Change of Use (except for a change of use to a caravan, camping or chalet site, or to a mobile home or park home site)

7.3 **National Design Guide 2019**

Context C1 - Relationship with local and wider context; C2 - Value heritage, local history and culture

Identity I1 - Respond to existing local character and identity; I2 Well-designed, high quality and attractive

Built form B1 - Compact form of development; B2 Appropriate building types and forms

Movement M3 - well-considered parking, servicing and utilities infrastructure for all users

Homes and Buildings H1 - Healthy, comfortable and safe internal and external environment, H3 - Attention to detail; storage, waste, servicing and utilities

Resources R3 - maximise resilience

Lifespan L3 - A sense of ownership

7.4 **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

LP5 – Meeting Housing Need (Part C – Meeting wider housing need)

LP6 – Employment, Tourism, Community Facilities and Retail

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

7.5 **Cambridgeshire Flood and Water SPD**

7.6 **Emerging Local Plan**

The Draft Fenland Local Plan (2022) was published for consultation on 25th August 2022, the first stage of the statutory process leading towards the adoption of the Plan. Given the very early stage which the Plan is therefore at, it is considered, in accordance with Paragraph 48 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
LP5: Health and Wellbeing
LP7: Design (aligns with the 10 characteristics of the National Design Guide)
LP8: Amenity Provision
LP12: Meeting Housing Needs
LP20: Accessibility and Transport
LP22: Parking Provision
LP23: Historic Environment
LP32: Flood and Water Management

8 **KEY ISSUES**

- **Principle of Development**
- **Character and heritage**
- **Context and use (LP6 considerations)**
- **Residential amenity**
- **Parking and highways**
- **Flood risk**
- **S106**
- **Other matters**

9 **ASSESSMENT**

Principle of Development

- 9.1 These premises are located within Wisbech town centre, one of the primary market towns within Fenland and is therefore identified as an area which should be the focus for new housing, employment growth, retail growth and wider service provision.
- 9.2 The scheme seeks to retain commercial units on the ground floor, fronting Bridge Street, whilst also helping to meet housing need and support the local economy.
- 9.3 In addition, it will bring a Listed Building back into active use, with any heritage impacts to be assessed in accordance with the NPPF and Policy LP18 of the FLP.
- 9.4 Matters of flood risk, access and servicing must also be considered in accordance with Policies LP14, LP15 and LP16 of the FLP.
- 9.5 Subject to the scheme according with the relevant policy framework the principle of development is considered to be acceptable in the instance.

Character and heritage

- 9.6 The Conservation Officer notes that ‘Historic England archive mapping indicates that the front bay of the building is covered by the extent of listing – the remainder may be considered as curtilage due to its attachment (but further research would be needed with regards to use and relationship), but regardless, it is clear that the rear wing is of less significance. However, local report has it that a rear bay facing onto Alexandra Road, may have an original turntable set into the ground for the post-vans’.
- 9.7 Specialist input from the Conservation Officer has directed certain changes to the scheme layout and concluded that the development is acceptable as now presented. There are no external alternations to the premises which would impact on the character of the area and whilst reservations are noted regarding bin collection bin storage provision is made within the building and bins will be collected and returned to this area; hence it is not considered that this element of the scheme represents any issues.
- 9.8 With regard to the Post Office lettering and war memorial, set into the west wall of the ground floor room, these are considered to be part of the architectural and historic interest of the building and are afforded protection as such. Earlier scheme approvals have specifically referenced the war memorial as to remain and there is nothing to suggest that a similar response would not be appropriate in this instance, further noting that this will be located within the commercial space and as such remaining on view.
- 9.9 In respect of the turntable which has been highlighted by the Wisbech Society and noted by the Conservation Officer as a feature of the rear section of the building the agent advises that this element has not been uncovered, nonetheless they indicate that they have to raise the floor by 300mm in this part of the building (to address flood risk) accordingly they note that *‘it will be simple to install a suspended floor over the top of the turntable leaving it undisturbed’*. It is considered that a safeguarding condition should be imposed on the Listed Building Consent that if discovered the turntable shall be mapped and photographed with these details to be submitted to the LPA as a record of this item and the feature retained in situ.
- 9.9 As required by both national and local plan policy a Heritage Statement accompanies the submission and this is accepted as sufficient to comply with these policy requirements.
- 9.7 Whilst the Conservation Officer notes that *‘the number of apartments on this scale may not be the most conducive to attracting settled residents and contributing to the economic regeneration of Wisbech (larger 2-3 bed family apartments would be preferable for this), it is not considered that single bed units will impact on the character and appearance of the conservation area, per se, especially given that the exterior of the building, including all windows and joinery will remain unaltered’*. Similarly, she notes that buildings with this level of subdivision sometimes suffer a deterioration in external rainwater goods and joinery however it would be hoped that suitable management arrangements would be put in place to counter such occurrences.
- 9.8 The Conservation Officer has limited her comments to the designated part of the building that has the most significance, namely the original Post Office section of the building to first, second and third floors. As indicated in the proposal section above revisions to the scheme were made following discussion

with the agent and the Conservation Officer concludes that the scheme now represents an acceptable compromise.

- 9.9 All historic features of the building such as the safe (to be utilised as a bedroom cupboard in one of the units), war memorial, historic ceilings and floor finishes are protected by the listing and are to be retained and repaired on a like-for-like basis. Where subdivision is proposed the works are largely reversible and acceptable on the basis that a viable use will outweigh the less than substantial harm, with the level of subdivision not felt to impact on the special interest of the building. Furthermore, the schedule of works will direct the conversion appropriately.
- 9.10 In conclusion the recommendation of the Conservation Officer is agreed in that 'the impact on the building overall is felt to be neutral and on the listed part/areas of significance, the works are reversible and outweighed by the public benefit of this building being found a viable use in principle, bearing in mind the concerns regarding condition as raised above'. The recommended condition relating to the need to agree the location and type of any external services, vents, soil and vent pipes, etc will be imposed to ensure that their installation/location does not negatively impact the special interest of the listed building.
- 9.11 Subject to the above it is considered that the scheme complies with Policy LP18 and the NPPF and may be supported.

Context and use (LP6 considerations)

- 9.12 Policy LP6 Employment, Tourism, Community Facilities and Retail highlights that retail development will be encouraged to maintain and enhance the vitality and viability of centres. Wisbech is identified as being one of the primary market towns in the settlement hierarchy and in turn the highest-level retail setting, along with March.
- 9.13 1 – 3 Bridge Street is also included within the primary shopping area with the frontage of the site to Bridge Street forming part of the primary shopping frontage where Policy LP6 indicates that development for a non-retail use (A2, A3, A4, A5 uses) at ground floor level will be supported provided that the proposal, including any committed planning permissions, would retain the predominant retail element within the frontage and not result in an adverse impact on the vitality and viability of the centre as a whole. That said Policy LP6 is somewhat overtaken by changes to the Use Classes Order which translates the current use into the wider E use which permits a range of commercial uses and in essence negates the retail retention element of Policy LP6. It is further noted that the last use of the frontage section of the premises was as a recruitment agency and as such an A2 use.
- 9.14 The scheme does however make provision for the retention of two commercial units on the ground floor of the former Post Office building fronting Bridge Street and this aspect is welcomed as this will make a positive contribution to the vitality and viability of the town. The future intended residents of the scheme will also contribute to the town centre as it will increase the footfall and spend in terms of goods and services. Finally, it will bring the building back into active use. Noting that the upper floors were vacated by FDC circa 2009 and the lower floor (section occupied by FDC) vacated autumn 2019; the remaining part of the ground floor having become vacant in June 2020.

Residential amenity

- 9.15 Taking forward the comments of the Town Council and The Wisbech Society the case officer raised the issue of overdevelopment with a view to securing a lesser number of units within the premises. However, although minor revisions were made the number of units remained consistent with the original proposals
- 9.16 Whilst ideally the level of units would be reduced it must be acknowledged that achieving a viable, if less than ideal, scheme will secure the long-term future of the listed building going forward and significant weight must be given to this factor.
- 9.17 The units will offer a reasonable level of residential amenity for the occupants and whilst some of the units are relatively small, they are well located to the town centre and will contribute to the housing mix of the town.
- 9.18 There is no requirement for provision of amenity space to support the development as per Policy LP16(h) and the site location is such that there are opportunities for outdoor recreation within walking distance.
- 9.19 In terms of the relationship of the property to adjoining premises no amenity issues or impacts are identified and as such the scheme achieves compliance with Policies LP2 & LP16 of the FLP (2014).

Parking and highways

- 9.20 The proposal includes provision for cycle parking but none for cars due to its town centre location. There is cycle storage available at basement level with a channel provided adjacent to the stairs to facilitate ease of cycle movement to the upper level. It should be noted that the FLP (2014) does not contain cycle parking standards, however it is noted that 13 stands are shown within the basement area.
- 9.21 This a town centre site and as such is considered to be a sustainable location; albeit the scheme comes forward with a nil parking provision.
- 9.22 Appendix A of the Fenland Local Plan allows for a reduced car parking provision and in special circumstances a nil parking provision where sites are centrally located within Market towns and benefit from good public transport links.
- 9.23 The 'special circumstances' in this case are deemed to be the re-use of a vacant building situated in a sustainable location within one of the Primary Market Towns of the District.
- 9.24 The delivery of 33 residential units in this location must be given significant weight and the proposal aligns with the aims of Chapter 11 of the NPPF which promotes the effective use of land, and particularly Para 120 (d) which outlines the need to *'promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure)'*.

- 9.25 It is considered there is appropriate justification for delivering this scheme with a nil parking provision and as such there are no matters to reconcile with regard to car parking provision or accessibility; the scheme is therefore considered compliant with Policies LP15 and LP16 of the FLP (2014).

Flood risk

- 9.26 The site is largely within a flood zone 1 location with only a small section of the building being located within flood zone 3; nonetheless as a major scheme the application has been referred to the relevant stakeholders, i.e. Environment Agency, LLFA and Anglian Water
- 9.27 The EA have confirmed that they have no objection to the scheme subject to adherence to the submitted FRA and have recommended a safeguarding condition to this effect.
- 9.28 It is also noted that Anglian Water (AW) have not objected to the scheme however they have recommended conditions requiring the submission of a scheme for on-site foul water drainage and surface water management.
- 9.29 In respect of foul water drainage AW have requesting that this detail is provided prior to construction above damp-proof course. Whilst this condition is considered necessary and relevant the timing must be revised to 'prior to occupation' noting that there is a connection already in place and given that this is a conversion scheme not a new construction.
- 9.30 The recommended condition relating to surface water management is not considered to meet the condition tests outlined in the NPPF given that it relates to the conversion of an existing building; accordingly, this condition will not be taken forward to any decision as issued. In this regard the comments made by the LLFA relating to a retrofitting of SUDs are noted however given that the physical characteristics of the building are unchanged it would not appear reasonable to secure such works.
- 9.31 As a change of use submission there is no requirement for the scheme to satisfy the sequential test however the exceptions test must be met. It is acknowledged that the submitted FRA satisfies the 2nd part of the test as this Assessment demonstrates that it *'will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall'*. In respect of the 1st part of the exception test, i.e. *'the development will provide wider sustainability benefits to the community that outweigh flood risk'* is noted that this is a redevelopment of a sustainable site within the urban area which will also see a vacant heritage asset being brought back into use. Officers are content, noting the limited area of the building which falls within Flood Zone 3, the mitigation proposed and the extent of housing units to be delivered that Part 1 of the exceptions test may be deemed as passed.
- 9.32 It is noted that the EA have commented in respect of a suitable flood evacuation plan although they have not recommended that a condition be imposed in this regard, nor will they comment on any subsequent evacuation plan submitted. Within the submitted FRA there are no recommendations relating to the provision of a bespoke flood evacuation plan, albeit it is recommended that occupants sign up to the Floodline Warnings Service. Mindful of the extent of

floorspace falling within the Flood Zone 3 area it is not considered necessary to secure an evacuation plan as part of any decision issued.

- 9.34 Subject to the imposition of suitable safeguarding condition(s) to secure compliance with the FRA and details of the intended scheme relating to foul water it is contended that the scheme is acceptable in flood risk terms and addresses Policy LP14 and the flood risk policies of the NPPF (2012).

S106

- 9.35 As a major scheme delivering over 10 units this scheme would attract a requirement for appropriate infrastructure contributions including affordable housing; notwithstanding this it is noted that the submitted planning statement highlights the Local Plan and CIL Viability Assessment commissioned by FDC as part of its Local Plan review and the Vacant Building Credit (VBC) which was introduced by the Government through planning practice guidance published on 28 November 2014; the former accepts that viability within the north of the district is challenging, even on green field sites, with the latter incentivising brownfield development on sites containing vacant buildings.
- 9.36 In essence the VBC deals with cases where a vacant building is brought back into a lawful use, or is demolished to be replaced by a new building, and allows for the developer to be offered a financial credit equivalent to the existing gross floorspace of relevant vacant buildings when the local planning authority calculates any affordable housing contribution which will be sought. Affordable housing contributions may be required for any increase in floorspace.
- 9.37 Noting that this development does not propose any increase of existing floorspace the existing floorspace of the vacant building should be credited against the floorspace of new development and a 100% 'credit' should apply resulting in no requirement for affordable housing. The application of VBC is subject to the application of a number of qualifying criteria and the S106 Officer has confirmed that these are met and that Vacant Building Credit is applicable to the proposed development. The S106 Officer has further confirmed, *'mindful of the Local Plan Viability Assessment, it is accepted that nil S106 contributions should be requested, and that no viability evidence is needed from the applicant in respect of these matters.'*
- 9.38 Given the above the scheme may proceed unencumbered by any S106 obligations.

Other matters

Refuse collection

- 9.39 The agent has clarified that *'the commercial units have no current bin store arrangements for the entire building, and the commercial space is being reduced from the whole building to just two ground floor units'*. Noting that *'the commercial fit out has not been planned yet then [they] would leave that to the incoming tenant to organise along with the toilets, kitchen, staff room etc'*.
- 9.40 The submission has been revised to detail the bin store and the general details of this in terms of capacity have been agreed by the Operations Manager –

Refuse. In terms of the more detailed specification of access to the bin store area this may be conditioned

Crime and design

- 9.40 The Crime and Design team have recommended that security and crime prevention are given considered in relation to the security of the buildings, access control, cycle and bin store security, mail delivery, lighting, and CCTV. As these elements are likely to be refined at detailed project planning stage it appears appropriate to condition these elements to ensure that the scheme ultimately aligns with Policy LP17 of the FLP (2014).

Asbestos removal

- 9.41 The condition relating to asbestos removal as recommended by the Environmental Health team is noted; however mindful of the 6 condition tests and NPPG (Paras: 3 to 5) such a condition is not considered warranted noting that Para 05 clearly states: *'Conditions requiring compliance with other regulatory regimes will not meet the test of necessity and may not be relevant to planning. Use of informatives to remind the applicant to obtain further planning approvals and other consents may be more appropriate'*.

10 CONCLUSIONS

- 10.1 This application proposes the use of a vacant listed building situated within the Wisbech Conservation Area. It will deliver a mixed commercial and residential scheme providing 2 ground floor commercial units and 33 units of residential accommodation.
- 10.2 Whilst the comments of the Town Council and The Wisbech Society are noted and acknowledged and officers have some sympathy with the points made, so much so that they endeavoured to secure scheme revisions in this regard. It must be noted that there would be no policy basis to withhold consent in this regard noting the absence of significant harm arising by virtue of the quantum of units. Furthermore, when giving weight to the reuse of this prominent heritage asset and noting the absence of any other material considerations which would indicate that the scheme should be resisted matters of 'amount' must fall away.
- 10.3 The application is recommended for approval as set out in the body of the report below having due regard to the duty in law under S16 Planning (Listed Buildings and Conservation Areas) Act 1990 and also the requirements of the National Planning Policy Framework 2021 and Policy LP18 of the Fenland Local Plan 2014.
- 10.4 Matters of flood risk, highways, residential amenity, security and servicing have also been considered alongside heritage and character considerations, with the Conservation Officer having also inputted into the latest iteration of the scheme and their suggestions incorporated.
- 10.5 It is considered that the scheme on balance aligns with the relevant policy framework and may be favourably recommended with appropriate conditions.

11 RECOMMENDATION: Grant

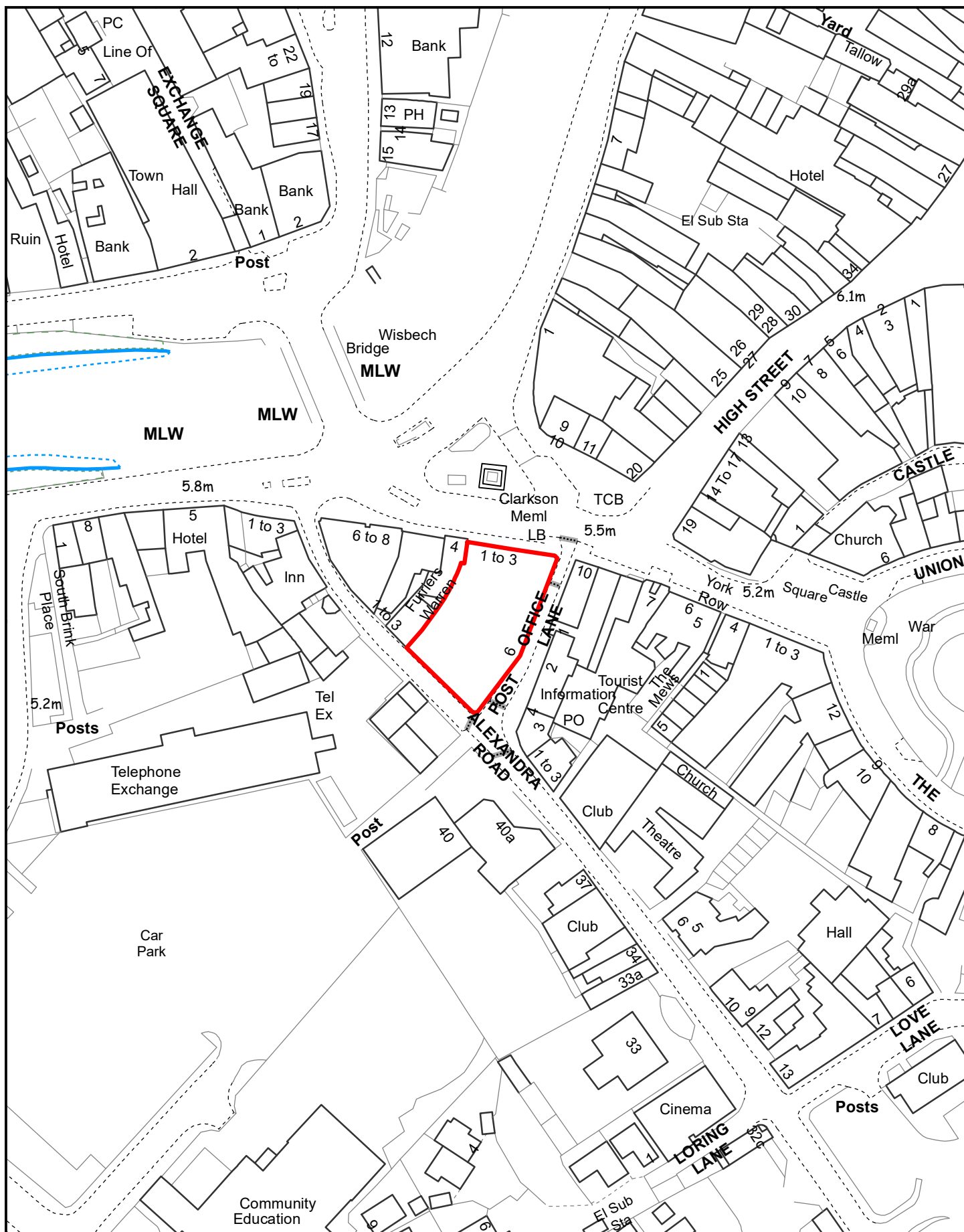
Conditions – F/YR22/0768/F

1	<p>The development permitted shall be begun before the expiration of 3 years from the date of this permission.</p> <p>Reason - To ensure compliance with Section 51 of the Planning and Compulsory Purchase Act 2004.</p>
2	<p>The development hereby approved shall be delivered in accordance with the submitted Flood Risk Assessment (FRA) undertaken by Ellingham Consulting LTD, Ref: ECL0790/ARC SURVEY & DESIGN CONSULTANTS dated June 2022 and the mitigation measures detailed in section 5.2 of the FRA shall be strictly adhered to:</p> <ul style="list-style-type: none"> - Finished Floor Level of the ground floor residential units to be no lower than 300mm above the existing ground level with 0.3m of flood resilient construction above the FFL. - No living accommodation on basement level are fully implemented and retained for the life of the development <p>Reason - To provide reasonable protection against flooding in accordance with Policy LP14 of the Fenland Local Plan 2014.</p>
3	<p>The Construction Management Plan (reference P701) hereby approved shall be adhered to throughout the construction period' except where varied by condition 4 of this planning permission.</p> <p>Reason - In the interests of the amenity of adjoining occupiers in accordance with Policies LP2 and LP16 of the Fenland Local Plan 2014.</p>
4	<p>No construction or demolition work shall be carried out and no plant or power operated machinery operated other than between the following hours: 08:00 hours and 18:00 hours on Monday to Friday, 08:00 hours and 13:00 hours on Saturday and at no time on Sundays, Bank or Public Holidays, unless otherwise previously agreed in writing with the Local Planning Authority.</p> <p>Reason - In the interests of the amenity of adjoining occupiers in accordance with Policies LP2 and LP16 of the Fenland Local Plan 2014.</p>
5	<p>Prior to occupation of any part of the development hereby approved, a scheme for on-site foul water drainage works, including connection point and discharge rate, shall be submitted to and approved in writing by the Local Planning Authority. Prior to the occupation of any phase, the foul water drainage works relating to that phase must have been carried out in complete accordance with the approved scheme.</p> <p>Reason - To prevent environmental and amenity problems arising from flooding in accordance with Policies LP14 and LP16 of the FLP (2014)</p>
6	<p>Prior to the first occupation of any part of the development hereby approved full details of any proposed external lighting/CCTV and all access control measures, including those relating to the bin store and cycle store, shall be submitted to and approved in writing by the Local Planning Authority. The agreed measures shall then be installed prior to first occupation of any of the</p>

	<p>residential units hereby approved and retained thereafter in perpetuity.</p> <p>Reason - In order to ensure adequate safety and security on site in accordance with Policies LP16 and LP17 of the Fenland Local Plan, adopted May 2014 and the NPPF (2021).</p>
7	Approved plans

Conditions – F/YR22/0769/LB

1	<p>The works/demolition permitted shall be begun not later than 3 years from the date of this consent.</p> <p>Reason - To ensure compliance with Section 51 of the Planning and Compulsory Purchase Act 2004.</p>
2	<p>Should the turntable feature, believed to be situated in the rear bay facing onto Alexandra Road, be discovered during the conversion works a written record shall be produced along with photographs and a suitably scaled drawing showing its location within the building; these details shall be submitted to the LPA to form a record of this historic feature within 2-months of its discovery. The turntable shall then be preserved in situ without disturbance in perpetuity thereafter.</p> <p>Reason - In order to preserve the special architectural and historic character of the Listed Building and in accordance with the provisions of the Town and Country Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) and Policy LP18 of the Fenland Local Plan 2014.</p>
3	<p>The location and type of any external services, vents, SVPs, etc, shall be submitted to and approved in writing by the local authority to ensure that their installation/location shall not negatively impact the special interest of the listed building. All works shall subsequently be undertaken strictly in accordance with the approved details.</p> <p>Reason - In order to preserve the special architectural and historic character of the Listed Building and in accordance with the provisions of the Town and Country Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) and Policy LP18 of the Fenland Local Plan 2014.</p>
4	Approved plans



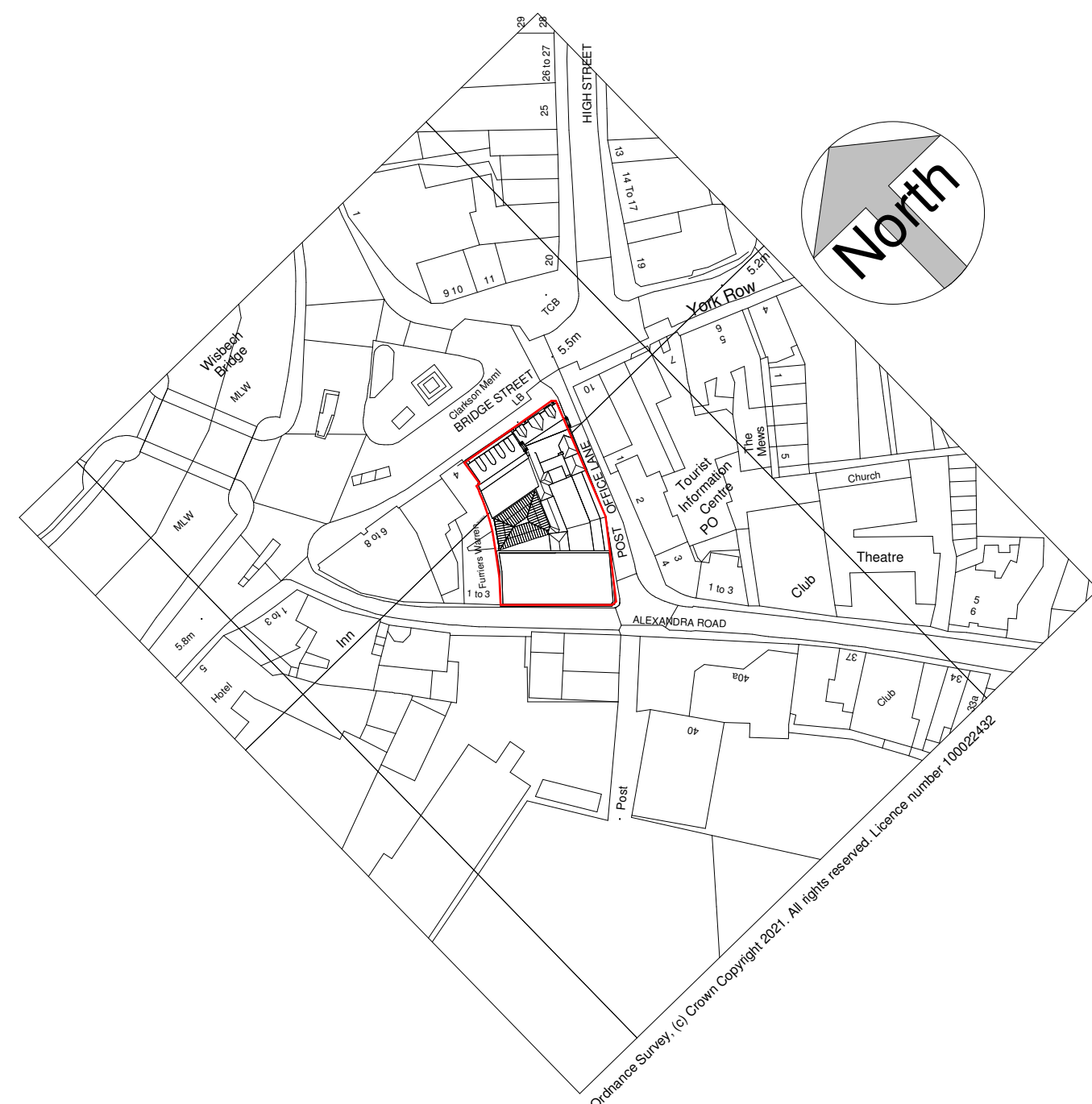
Created on: 06/07/2022

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F/YR22/0768/F

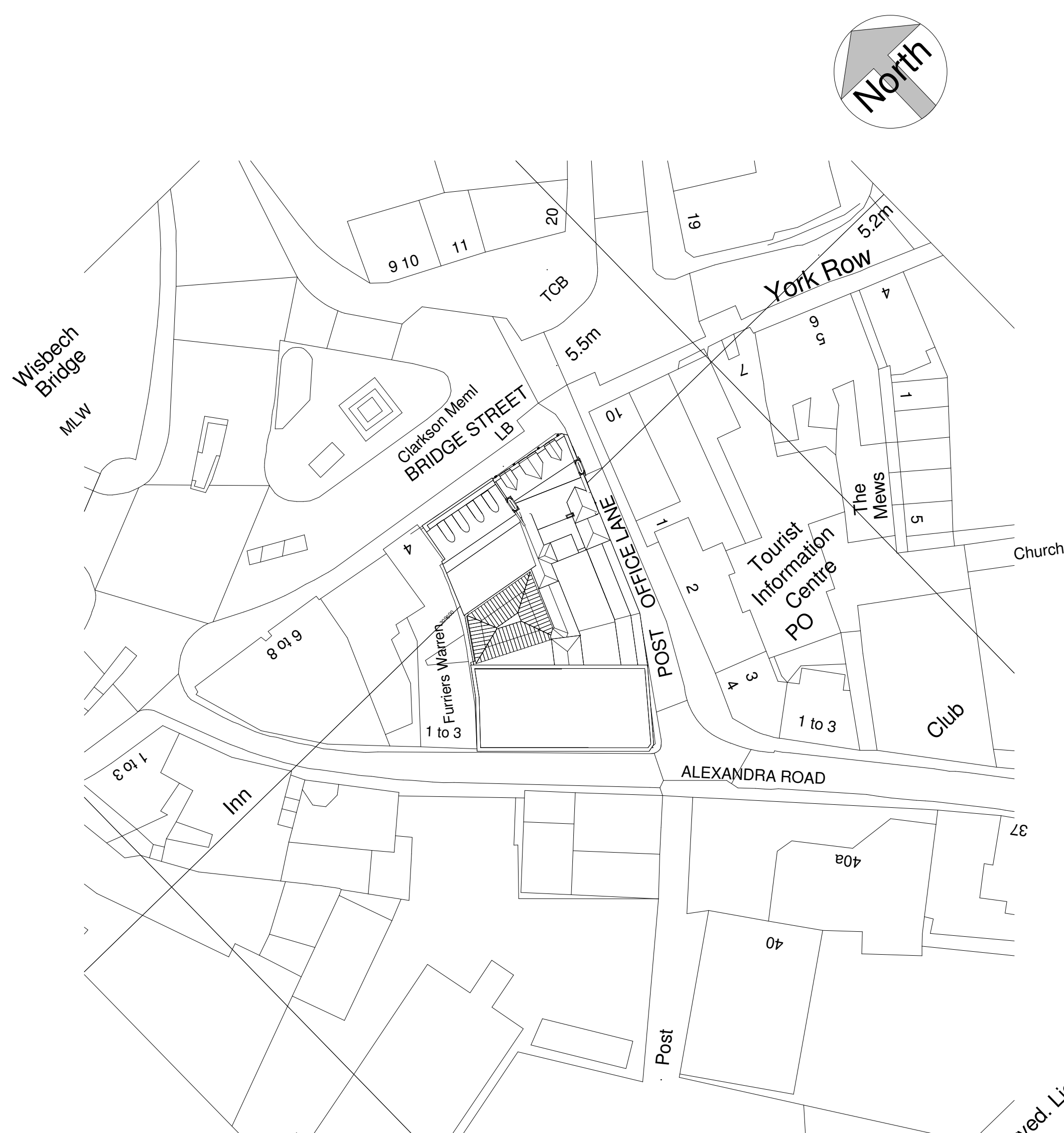
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Location Plan

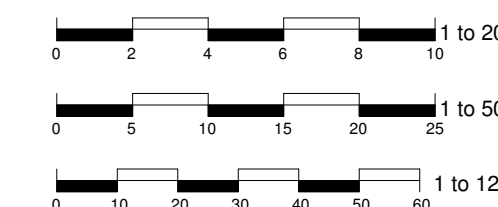
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Existing Block Plan



Existing Site Plan

[illegible]

Wisbech Post Office, 1-3
Bridge Street, Wisbech,
PE13 1EW

Conversion to dwellings

Site Plan Existing

Project number	21 030
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Date	10.03.22
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Drawn by RG

Paper size	A1
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E001

Scale	As indicated
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Wisbech Post Office, 1-3
Bridge Street, Wisbech,
PE13 1EW

Conversion to dwellings

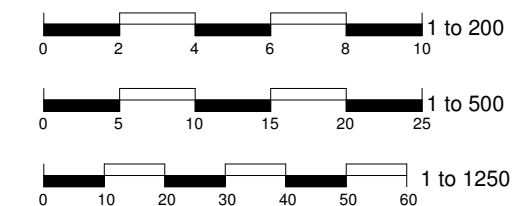
Project number	21 030
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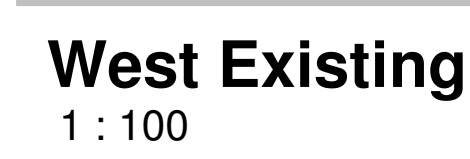
Drawn by	Author
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Doc1

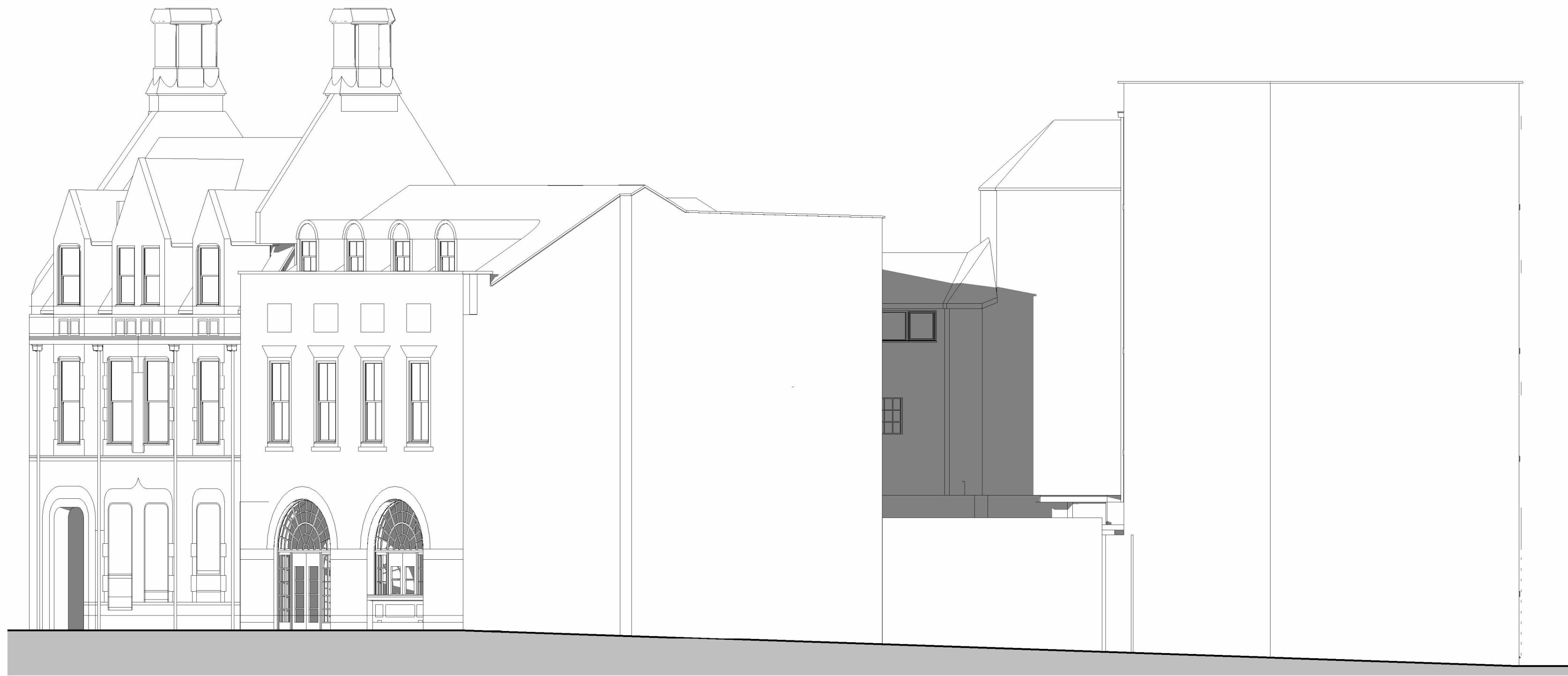
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01/06/2022 19:36:33



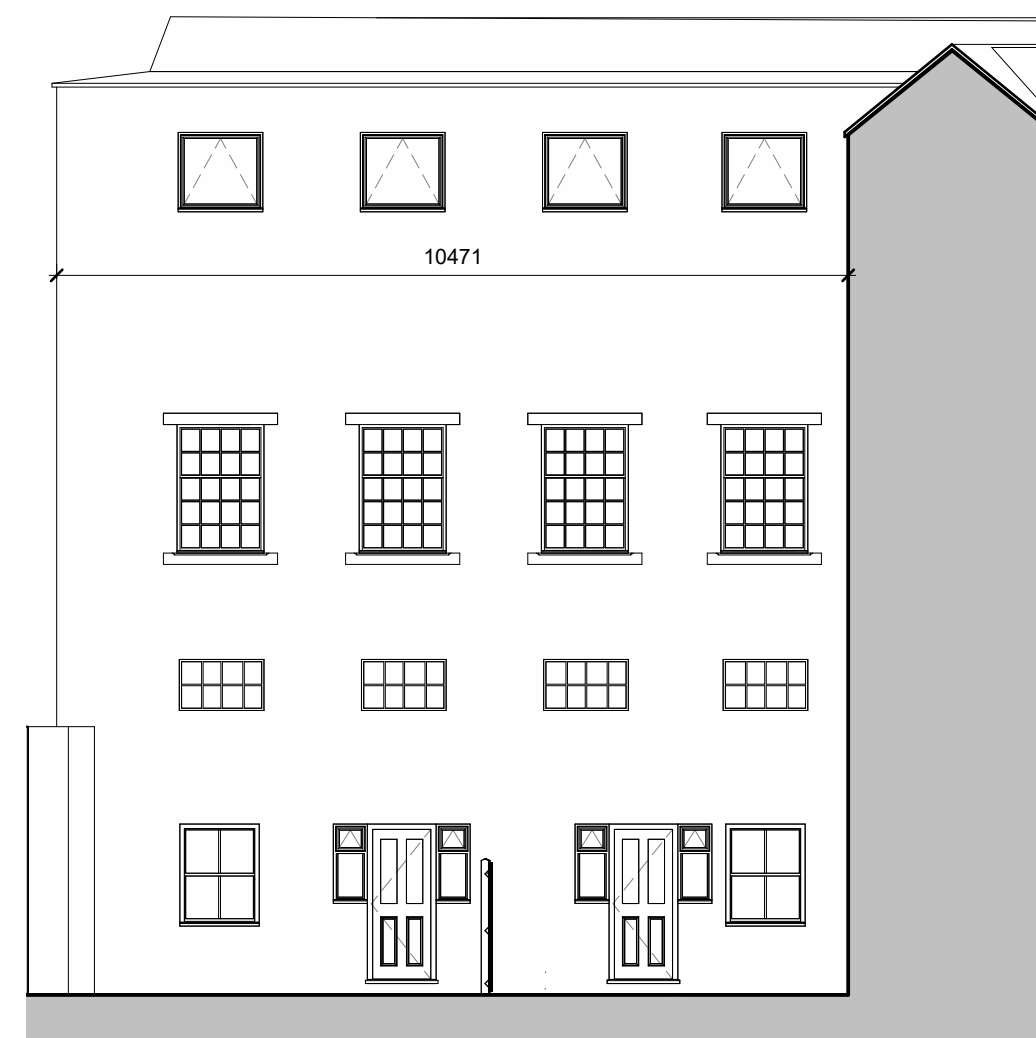


Wisbech Post Office, 1-3 Bridge Street, Wisbech, PE13 1EW	
Conversion to dwellings	
Existing Elevations	
Project number	21 030
Date	10.03.22
Drawn by	Author
Paper size	A1
E005	
Scale	1 : 100

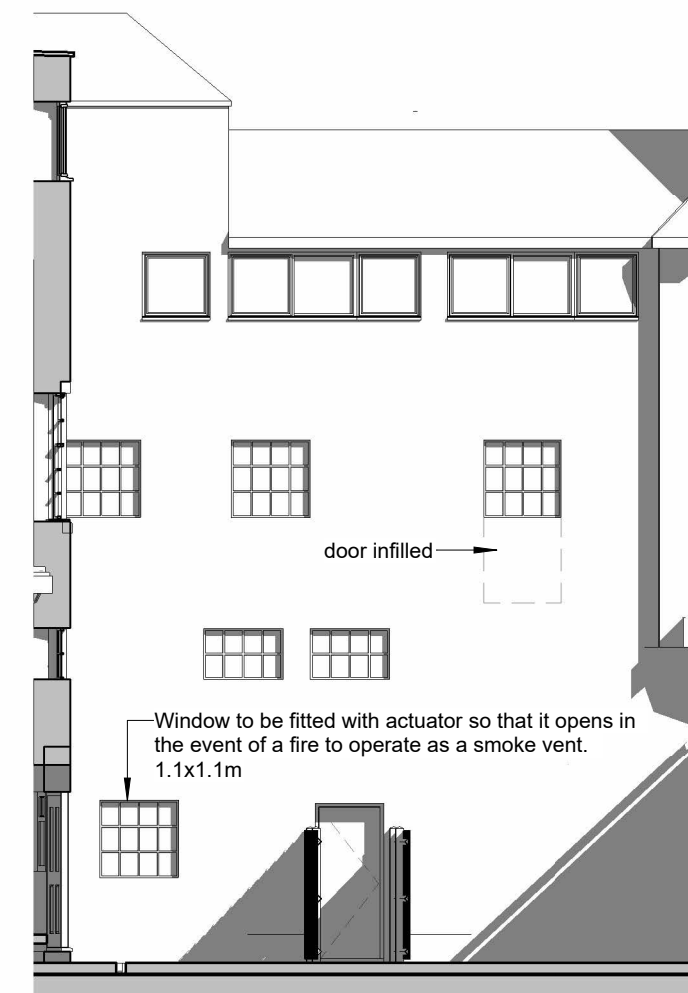


West Proposed

1 : 100



Courtyard 1 (S) Proposed



Courtyard 2 (W) Proposed



Courtyard 3 (N) Copy 1
1 : 100

Wisbech Post Office, 1-3
Bridge Street, Wisbech,
PE13 1EW

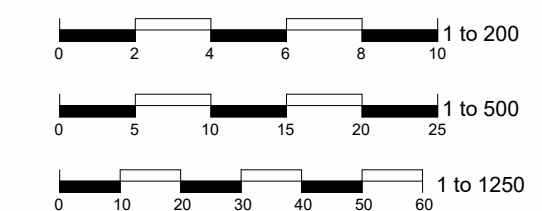
Conversion to dwellings

Proposed Elevations and sections

Project number	21 030
Date	10.03.22
Drawn by	Author
Paper size	A1

P402

Scale 1 : 100





This is a detailed architectural line drawing of a historic building facade. The drawing shows a multi-story structure with a complex roofline featuring several gables and two prominent chimneys. The facade is composed of several distinct sections. On the left, there is a section with a series of tall, narrow windows. The central portion of the building features a prominent entrance with a large, arched doorway and a series of windows above it. To the right of the entrance, there is another section with a series of windows and a small, arched entrance at the ground level. The drawing uses fine lines to represent architectural details such as window frames, moldings, and roof structures. The overall style is that of a technical architectural drawing, likely used for restoration or construction purposes.

A photograph of a historic building facade. The left side features a three-story structure with a 'POST OFFICE' sign and a red postbox. The right side is a two-story brick building with a large arched entrance and a boarded-up window. Two people are walking on the sidewalk in front.

Existing Elevations	
Project number	21 030
Date	10.03.22
Drawn by	Author
Paper size	A1
E004	
Scale	1 : 100

[illegible]

Wisbech Post Office, 1-3
Bridge Street, Wisbech,
PE13 1EW

Conversion to dwellings

Proposed Elevations

Project number	21 030
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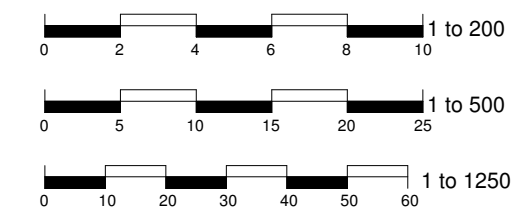
Date 10.03.22

Drawn by	Author
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Paper size	A1
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P401

Scale 1 : 100



[illegible]

Conversion to dwellings

Floor Plans Existing

Project number	21 030
Date	10.03.22
Drawn by	RG
Paper size	A1
E002	
Scale	1 : 100



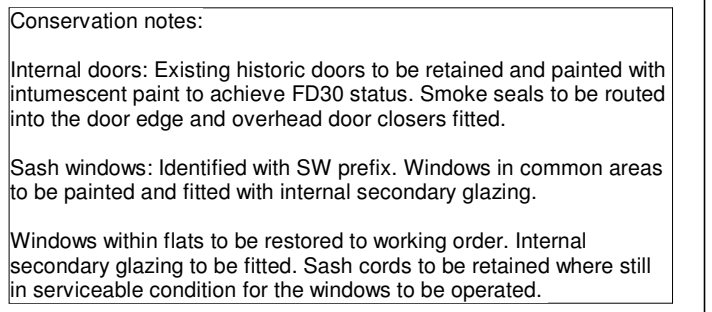
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Wisbech Post Office, 1-3
Bridge Street, Wisbech,
PE13 1EW

Conversion to dwellings

Proposed Ground Floor

Project number	21 030
Date	10.03.22
Drawn by	RG
Paper size	A1
P100	
Scale	1 : 100



13 flats

[illegible]

Wisbech Post Office, 1-3
Bridge Street, Wisbech,
PE13 1EW

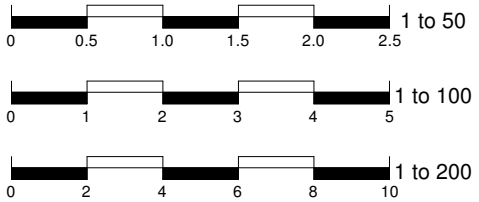
Conversion to dwellings

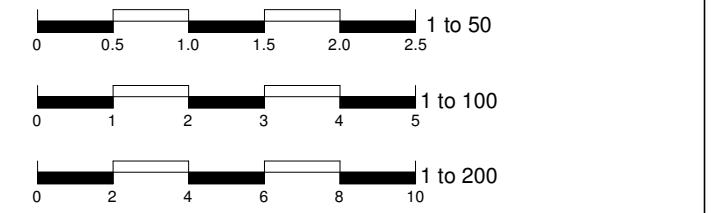
Proposed First Floor

Project number	21 030
Date	10.03.22
Drawn by	RG
Paper size	A1

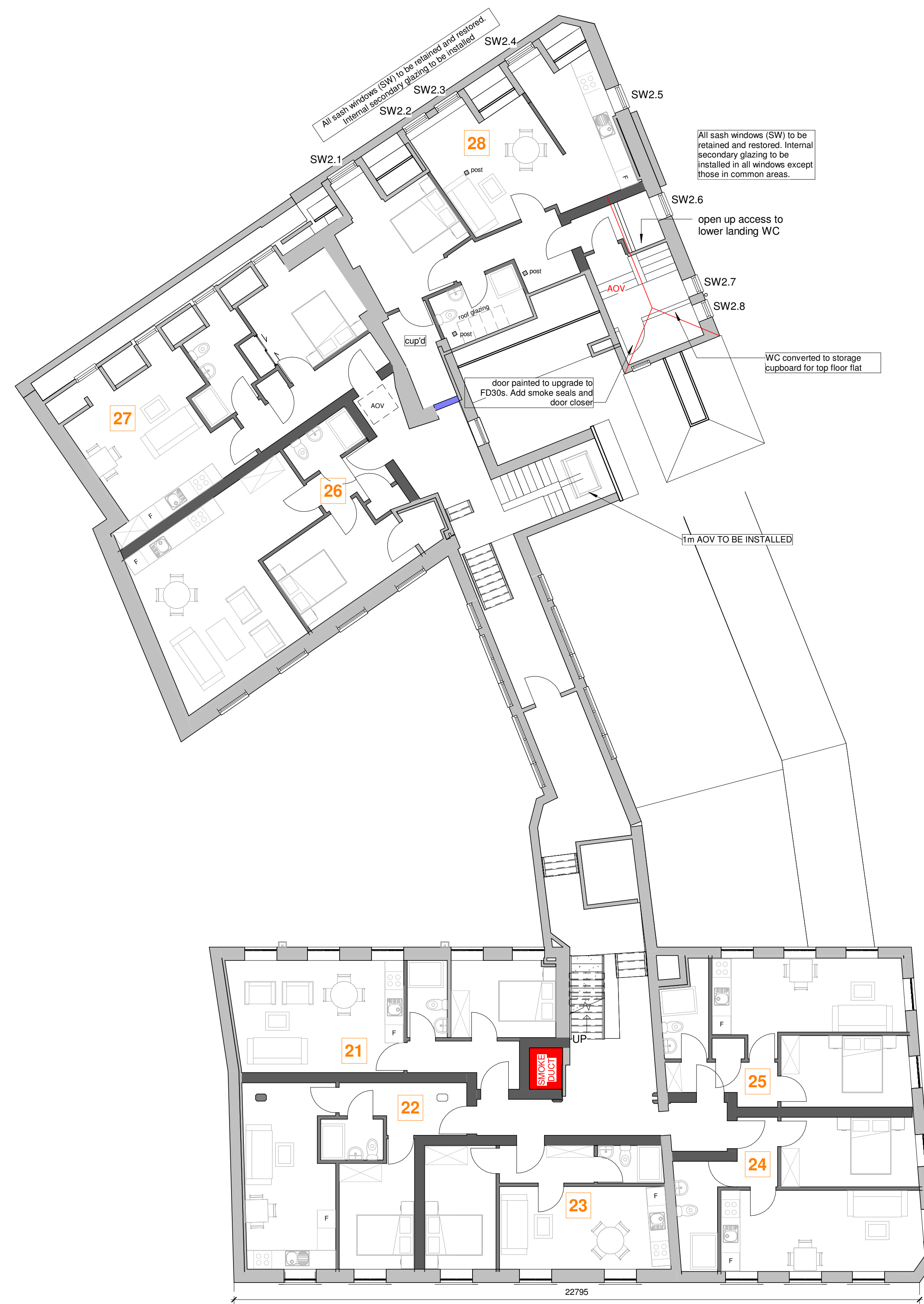
P200

Scale 1 : 100

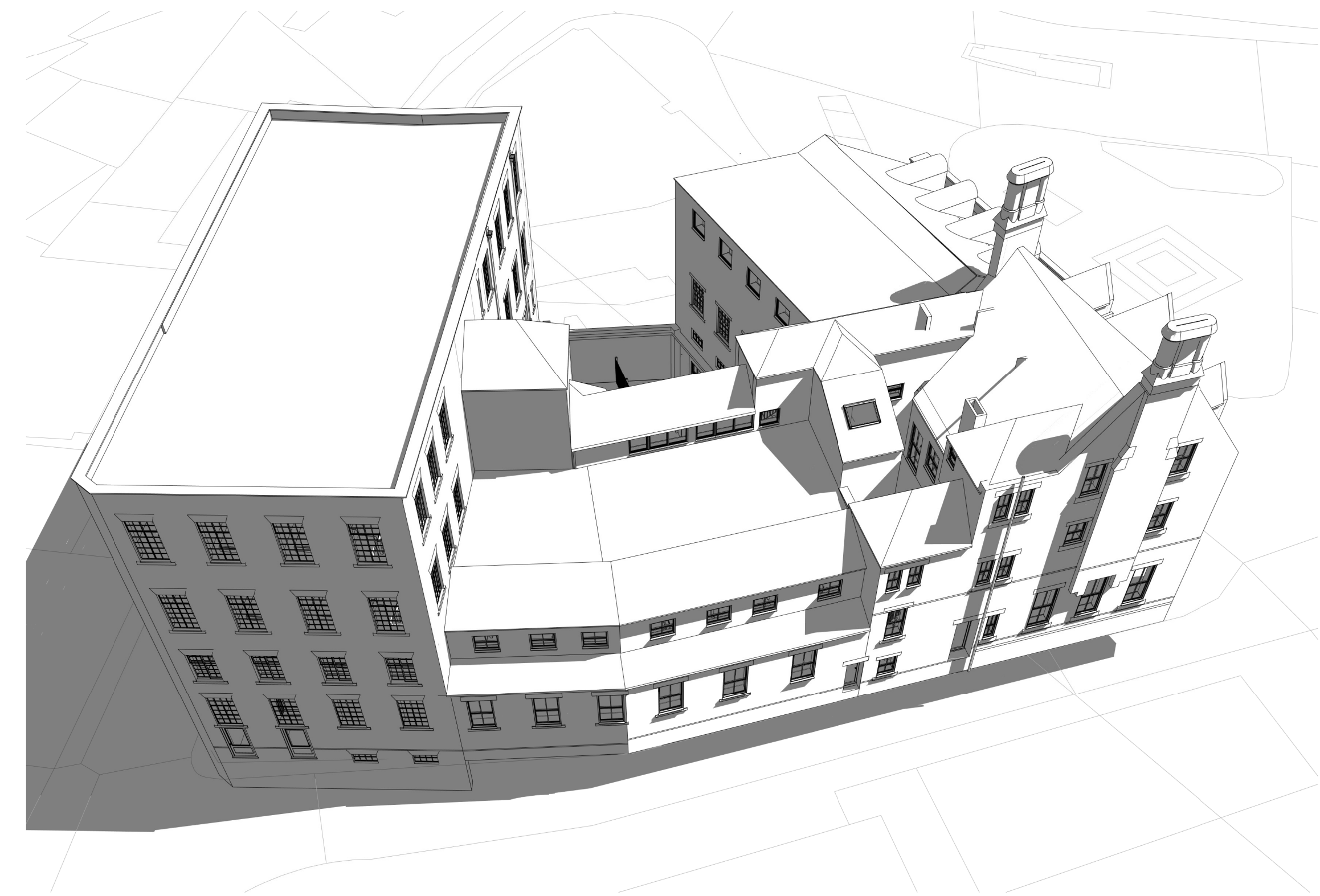




<p>Wisbech Post Office, 1-3 Bridge Street, Wisbech, PE13 1EW</p> <p>Conversion to dwellings</p>	
<p>Floor Plans Existing</p>	
Project number	21 030
Date	10.03.22
Drawn by	RG
Paper size	A1
<p>E003</p>	
Scale	1 : 100



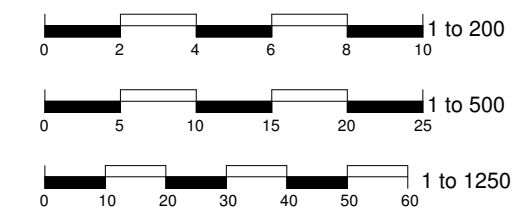
2 Proposed Second Floor



3D View 1



3 Proposed Third Floor

[illegible]

Wisbech Post Office, 1-3
Bridge Street, Wisbech,
PE13 1EW

Conversion to dwellings

Proposed Second and Third Floor

Project number	21 030
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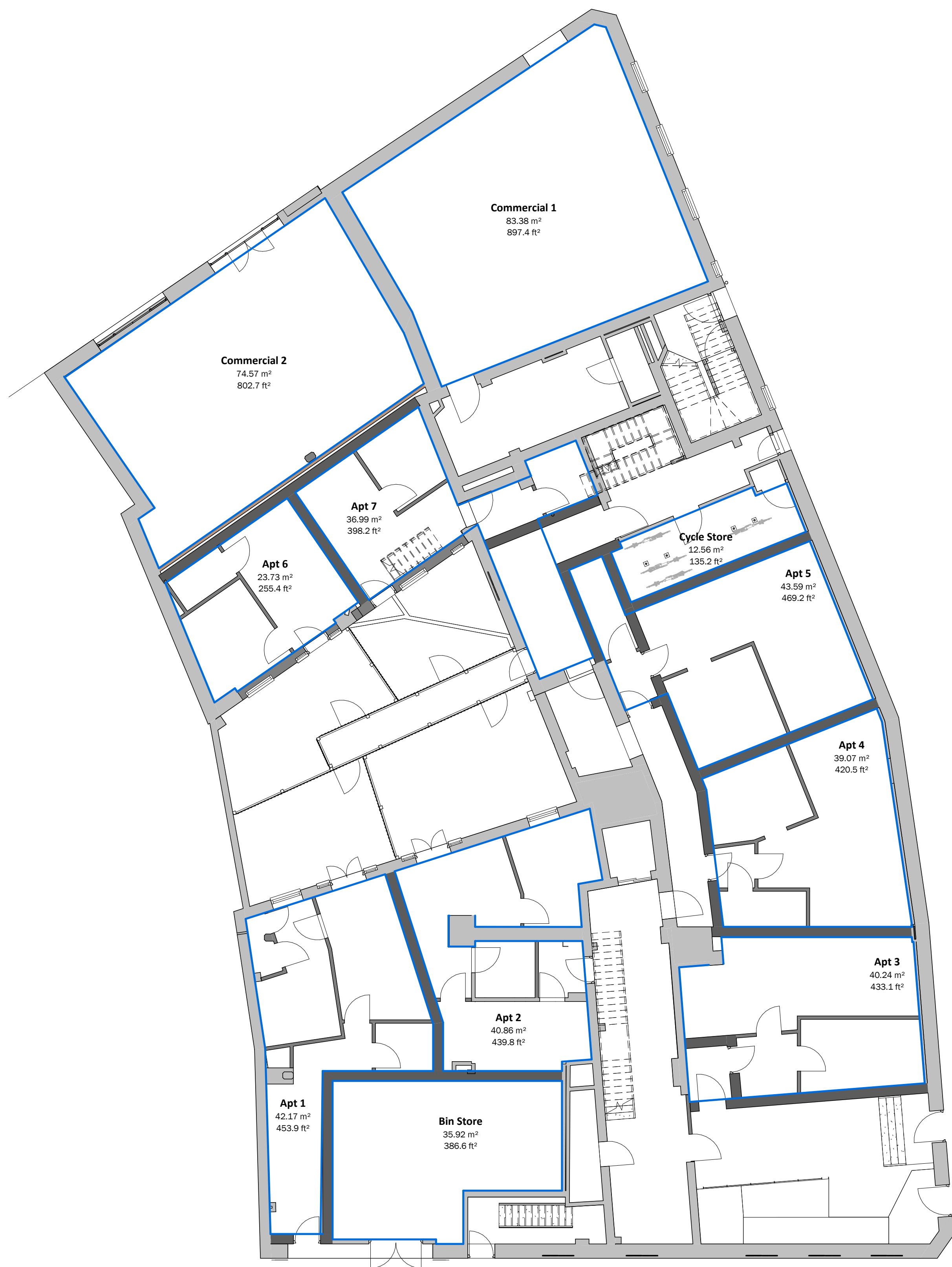
Date 10.03.22

Drawn by RG

Paper size	A1
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P300

Scale 1 : 100



Ground Floor Area Plan

1 : 100



First Floor Area Plan

Floor Areas

Third floor: Existing / Proposed 236m²
Second Floor: Existing / Proposed 466m²
First Floor: Existing / Proposed 618m²
Ground Floor: Existing 803m² Proposed 705m²
Basement: Existing / Proposed 109m²
TOTAL: Existing 2232m² Proposed 2134m²

Proposed class E: 158m²
Proposed C3: 1976m² inc common areas
Demolished: 98m²

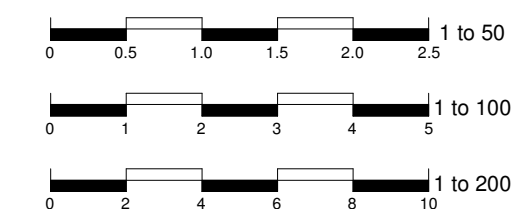
Area Schedule		
Name	Area	Level
Apt 1	42 m²	Ground Floor Rear Entrance
Apt 2	41 m²	Ground Floor Rear Entrance
Apt 3	40 m²	Ground Floor Rear Entrance
Apt 4	39 m²	Ground Floor Rear Entrance
Apt 5	44 m²	Ground Floor Rear Entrance
Apt 6	24 m²	Ground Floor Rear Entrance
Apt 7	37 m²	Ground Floor Rear Entrance
Apt 8	38 m²	First Floor Area Plan
Apt 9	37 m²	First Floor Area Plan
Apt 10	32 m²	First Floor Area Plan
Apt 11	37 m²	First Floor Area Plan
Apt 12	37 m²	First Floor Area Plan
Apt 13	37 m²	First Floor Area Plan
Apt 14	31 m²	First Floor Area Plan
Apt 15	33 m²	First Floor Area Plan
Apt 16	22 m²	First Floor Area Plan
Apt 17	27 m²	First Floor Area Plan
Apt 18	25 m²	First Floor Area Plan
Apt 19	21 m²	First Floor Area Plan
Apt 20	75 m²	First Floor Area Plan
Apt 21	39 m²	Second Floor Area Plan
Apt 22	38 m²	Second Floor Area Plan
Apt 23	33 m²	Second Floor Area Plan
Apt 24	38 m²	Second Floor Area Plan
Apt 25	38 m²	Second Floor Area Plan
Apt 26	53 m²	Second Floor Area Plan (U)
Apt 27	41 m²	Second Floor Area Plan (U)
Apt 28	49 m²	Second Floor Area Plan (U)
Apt 29	40 m²	Third Floor Area Plan
Apt 30	38 m²	Third Floor Area Plan
Apt 31	33 m²	Third Floor Area Plan
Apt 32	38 m²	Third Floor Area Plan
Apt 33	38 m²	Third Floor Area Plan
Bin Store	36 m²	Ground Floor Rear Entrance
Commercial 1	83 m²	Ground Floor Rear Entrance
Commercial 2	75 m²	Ground Floor Rear Entrance
Cycle Store	13 m²	Ground Floor Rear Entrance

[illegible]

<p>Wisbech Post Office, 1-3 Bridge Street, Wisbech, PE13 1EW</p> <p>Conversion to dwellings</p>

Area Plans GF FF

Project number	21 030
Date	10.03.22
Drawn by	RG
Paper size	A1
P501	
Scale	1 : 100

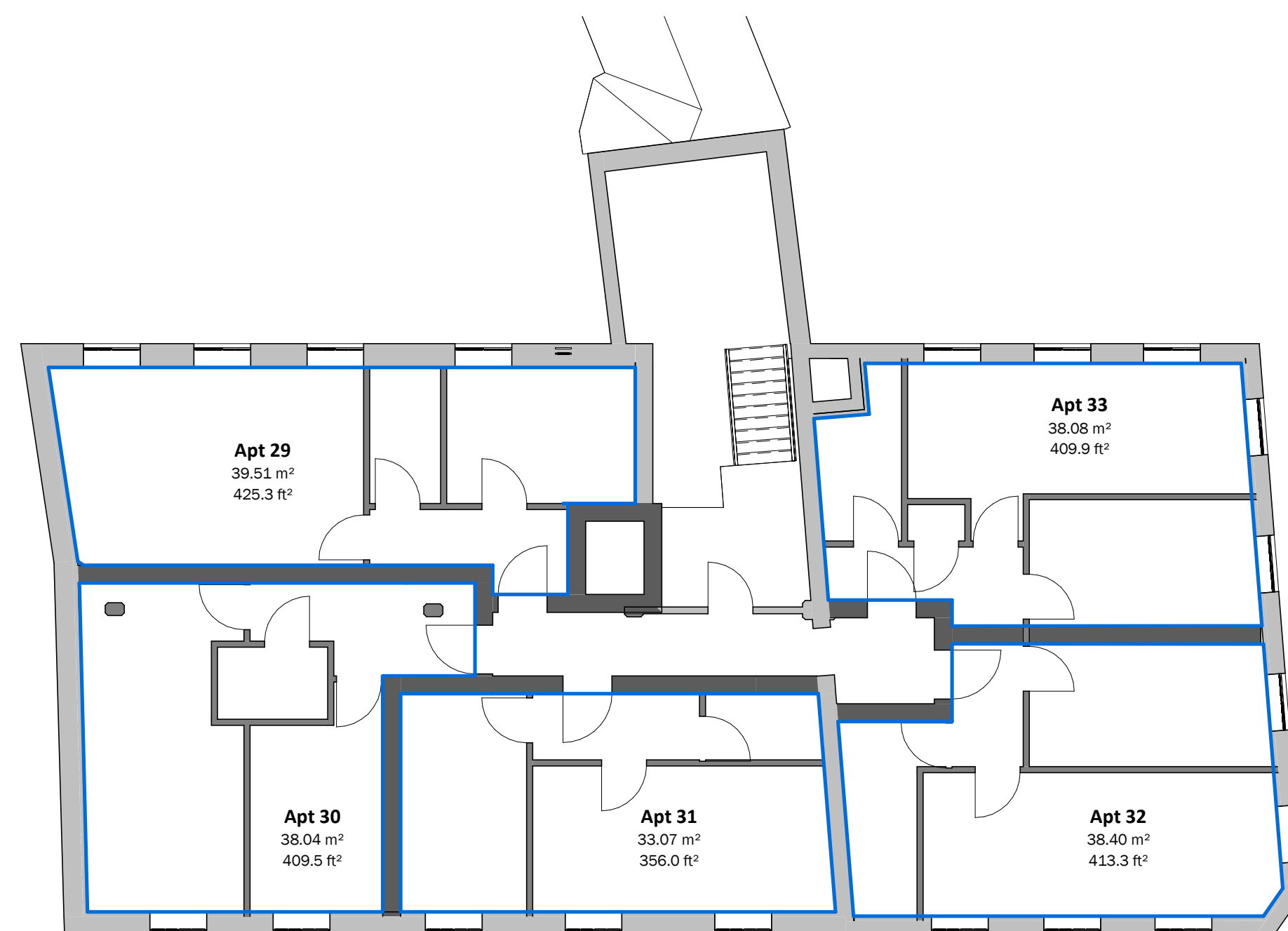




Second Floor Area Plan

1 : 100

1 : 100



Third Floor Area Plan

1 : 100

Floor Areas

Third floor: Existing / Proposed 236m²
Second Floor: Existing / Proposed 466m²
First Floor: Existing / Proposed 618m²
Ground Floor: Existing 803m² Proposed 705m²
Basement: Existing / Proposed 109m²
TOTAL: Existing 2232m² Proposed 2134m²

Proposed class E:158m²
Proposed C3: 1976m² inc common areas
Demolished: 98m²

Area Schedule		
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Apt 5	44 m ²	Ground Floor Rear Entrance
Apt 6	24 m ²	Ground Floor Rear Entrance
Apt 7	37 m ²	Ground Floor Rear Entrance
Apt 8	38 m ²	First Floor Area Plan
Apt 9	37 m ²	First Floor Area Plan
Apt 10	32 m ²	First Floor Area Plan
Apt 11	37 m ²	First Floor Area Plan
Apt 12	37 m ²	First Floor Area Plan
Apt 13	37 m ²	First Floor Area Plan
Apt 14	31 m ²	First Floor Area Plan
Apt 15	33 m ²	First Floor Area Plan
Apt 16	22 m ²	First Floor Area Plan
Apt 17	27 m ²	First Floor Area Plan
Apt 18	25 m ²	First Floor Area Plan
Apt 19	21 m ²	First Floor Area Plan
Apt 20	75 m ²	First Floor Area Plan
Apt 21	39 m ²	Second Floor Area Plan
Apt 22	38 m ²	Second Floor Area Plan
Apt 23	33 m ²	Second Floor Area Plan
Apt 24	38 m ²	Second Floor Area Plan
Apt 25	38 m ²	Second Floor Area Plan
Apt 26	53 m ²	Second Floor Area Plan (U)
Apt 27	41 m ²	Second Floor Area Plan (U)
Apt 28	49 m ²	Second Floor Area Plan (U)
Apt 29	40 m ²	Third Floor Area Plan
Apt 30	38 m ²	Third Floor Area Plan
Apt 31	33 m ²	Third Floor Area Plan
Apt 32	38 m ²	Third Floor Area Plan
Apt 33	38 m ²	Third Floor Area Plan
Bin Store	36 m ²	Ground Floor Rear Entrance
Commercial 1	83 m ²	Ground Floor Rear Entrance
Commercial 2	75 m ²	Ground Floor Rear Entrance
Cycle Store	13 m ²	Ground Floor Rear Entrance

arc

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Architectural Services
Chartered Building Surveyors

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Peterborough, PE7 8HP

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e: info@arcsurvey.co.uk
e: arcpb.co.uk

[illegible]

<p>Wisbech Post Office, 1-3 Bridge Street, Wisbech, PE13 1EW</p> <p>Conversion to dwellings</p>

Area Plans SF TF

Project number	21 030
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Date	10.03.22
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Drawn by RG

Paper size	A1
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P502

Scale 1 : 100

