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**F/YR25/0802/PIP**

**Applicant: McDermott Residential  
Property Limited**

**Agent: Mr R Papworth  
Morton & Hall Consulting Ltd**

**Land North West Of 176 High Road Accessed From, Hassock Hill Drove,  
Gorefield, Cambridgeshire**

**Permission in principle for 9 x dwellings**

**Officer recommendation: Refuse**

**Reason for Committee: Number of representations contrary to Officer  
recommendation.**

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## **1 EXECUTIVE SUMMARY**

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| <p>1.1. This is an application for Permission in Principle (first stage) for up to nine dwellings on a parcel of agricultural land in the countryside outside of the existing developed footprint of Gorefield. There are no material considerations which outweigh the determination of this application in accordance with the adopted policies and in line with the NPPF.</p> <p>1.2. Only matters of location, use of land and amount of development can be considered at this stage. All matters of detail would be subject to Technical Details approval if this first stage Permission in Principle were approved.</p> <p>1.3. With regard to location, the proposal fails to recognise the intrinsic character and beauty of the countryside and the pattern and character of the surrounding natural landscape and sporadic built character of the immediate area of Hassock Hill Drove which is largely open agricultural land. It would be inconsistent with the core shape of the village, conflicting with the settlement hierarchy of the Local Plan, and would appear incongruous both in terms of the landscape character of the area and in terms of visual appearance. It will inevitably result in an unacceptable urbanising impact and an adverse impact on the verdant rural character.</p> <p>1.4. Furthermore, the site lies in an area at high risk of flooding and insufficient justification has been provided to demonstrate that development of the site is necessary in this instance having regard to national policy which seeks to steer development to the lowest area of flood risk in the first instance. As such, the proposal conflicts with FLP Policy LP14 and Chapter 14 of the NPPF.</p> <p>1.5. In addition, if the principle of development in this location were acceptable, the development for up to 9 dwellings would result in overdevelopment, contrary to the environmental objectives of Paragraph 8 of the NPPF.</p> <p>1.6. Accordingly, the recommendation is to refuse permission in principle for residential development of this site.</p> |
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## **2 SITE DESCRIPTION**

- 2.1. The application site is located to the east side of Hassock Hill Drove, Gorefield approximately 75m from its crossroad junction with High Road, Decoy Road and Allen's Drove and comprises a grassland agricultural field with vegetated boundaries to the north and east. A mix of post and wire fence and vegetation extend along the Hassock Hill Drove frontage. Opposite the site, on the western side of Hassock Hill Drove, is an apple orchard, likely associated with Newling Fruitgrowers, whose commercial premises is located to the south side of High Road.
- 2.2. To the south of the site, fronting High Road, is a development of 5 dwellings, in various stages of construction, approved under F/YR23/0548/O, the northernmost boundary of which backs onto the application site. This development appears to create the boundary of the edge of the main settlement of Gorefield, as defined under LP12, which progresses eastward along High Road into the village centre with development flanking both sides of the road.
- 2.3. Approximately 26m to the north of the site, separated by a line of mature trees and an area of garden land is a dwelling and annexe known as Swan Lodge. Beyond this, development becomes more sporadic with a cluster of four dwellings and a small commercial premises set approximately 130m north the development site on the eastern side of Hassock Hill Drove. On its western side, development is minimal, with large swathes of agricultural land apparent. Similarly to the southwest, residential development becomes more widespread as you progress west along Decoy Road.
- 2.4. The site is entirely within Flood Zone 3, the area of highest risk.

## **3 PROPOSAL**

- 3.1. Planning in Principle (PIP) applications are an alternative way of obtaining planning permission for housing led development and separates the consideration of matters of principle for proposed development from the technical detail.
- 3.2. As set down in the Town & Country Planning (Permission in Principle) Order 2017 and Town & Country Planning (Brownfield Land Register) Regulations 2017, the scope of PIPs (stage 1 of the process) is restricted to consideration of location, development size and land use. All other matters are 'reserved' for consideration by the stage 2 Technical Details application which may be made should PIP be granted.
- 3.3. Although not a requirement of a PIP application, the application is supported by an indicative site plan and street scenes, showing four dwellings situated in a frontage arrangement on Hassock Hill Drove, with five smaller dwellings set behind. The site plan indicates shared access via a single access from the public highway leading to shared driveways and parking areas for each of the dwellings. Parking and turning is shown to the front of the dwellings with garden space to the rear. The street scene depicts the frontage dwellings as

various sizes, but each with two storeys, some with attached garages and some without.

- 3.4. The current proposal is the first part of the Permission in Principle application; this 'first stage' (or Permission in Principle stage) establishes whether a site is suitable in principle and assesses the 'principle' issues namely:
  - a) Location,
  - b) Use, and
  - c) Amount of development proposed
- 3.5. Should this application be successful, the applicant would have to submit a Technical Details application (stage 2 of the process) covering all other detailed material planning considerations. The approval of Permission in Principle alone does not constitute the grant of planning permission. Technical details consent regarding the proposed properties would need to be applied for should this application be granted.
- 3.6. Full plans and associated documents for this application can be found at: <https://www.publicaccess.fenland.gov.uk/publicaccess/>

#### **4 SITE PLANNING HISTORY**

- 4.1. The application site specifically has no pertinent planning history; the below table outlines details of the history of the land to the south.

F/YR25/3073/COND	Details reserved by Condition 03 (Materials) of planning permission F/YR24/0960/RM (Plot 1 only) pursuant to outline permission F/YR23/0548/O Land West of 176 High Road, Gorefield	Approved 15.08.2025
F/YR24/0960/RM	Reserved Matters application relating to detailed matters of access, appearance, landscaping, layout and scale (Plot 1 only) pursuant to outline permission F/YR23/0548/O Land West of 176 High Road, Gorefield	Approved 06.06.2025
F/YR24/0832/RM	Reserved Matters application relating to detailed matters of access, appearance, landscaping, layout and scale (Plot 4 only) pursuant to outline permission F/YR23/0548/O Land West of 176 High Road, Gorefield	Approved 05.06.2025
F/YR23/0548/O	Erect up to 5 x dwellings (outline application with all matters reserved) and the formation of 5 x accesses Land West of 176 High Road, Gorefield	Granted 25.08.2023

#### **5 CONSULTATIONS**

##### **5.1. Gorefield Parish Council**

*Gorefield Parish Council does not support this application.*

*It is in Flood Zone 3 and it always lays very wet after rain*

*The access is onto Hassockhill Drove which is a very narrow country road which also has very poor visibility at the junction with High Road*

*It is development in the open countryside*

*It appears to be over development.*

*Gorefield Parish Council has always been against development in this area but were over ruled by the planning committee when the front part of the site was developed.*

*The applicant has been currying favour of the Parish Councillors to support this application. He has also been contacting local residents who have been complaining about this to the Parish Council.*

## **5.2. Cambridgeshire County Council Highways Authority**

### **Recommendation**

*After a review of the submitted information the highways authority objects to this application and would recommend refusal on the grounds of highways safety.*

### **Comments**

*The applicant has proposed a new junction on to Hassock Hill Drove. This section of road has a 60mph speed limit and the shown achievable visibility plays to the north at only 2.4m x 79m which is below the required length of 2.4m x 215m. There has been no speed traffic survey information to demonstrate that these can be reduced in line with the DMRB guidance. I would also add that there is no current footway network in the area for the future residences of this site to access any local amenities therefore making this site only safely accessible by vehicles, from the perspective of the local highways authority.*

## **5.3. Environment Agency**

*We have reviewed the documents as submitted and we have no objection to this planning application. Further information on Flood Risk can be found below.*

### **Flood Risk**

*We highly recommend the development be carried out in accordance with the submitted flood risk assessment (Ref: ECL1646/MORTON & HALL CONSULTING ; dated October 2025; submitted by Ellingham consulting LTD. and the following mitigation measures it details:*

- *Finished floor levels shall be set 0.3m above existing ground level*
- *Flood Resilient Construction to 0.3m above Finished Floor Levels*

*These mitigation measures shall be fully implemented prior to occupation and subsequently in accordance with the scheme's timing/ phasing arrangements. The measures detailed above shall be retained and maintained thereafter throughout the lifetime of the development.*

#### 5.4. **North Level Internal Drainage Board**

*Further to your consultation, based on the present indicative information, the Board has no objection in principle to the development of this site.*

*As part of any future planning application, details (including relevant supporting evidence/designs) will need to be provided about the proposed method and systems to manage surface water run-off arising from the development.*

*If surface water run-off is to be discharged into a watercourse, an application seeking consent from the Board will be required. If such an application is consented, this may be subject to conditions, including the payment of a development levy.*

*Furthermore, should the development include the proposed alteration of any watercourse, that would also require prior written consent from the Board.*

#### 5.5. **Anglian Water Services Ltd**

##### **ASSETS**

##### Section 1 - Assets Affected

*New development must comply with Building Regulations and the Water Industry Act.*

*Our records show that there are no assets owned by Anglian Water or those subject to an adoption agreement within the development site boundary or affected by the proposals.*

*It is highly recommended that the applicant carries out a thorough investigation of the proposed working area to establish whether any unmapped public or private sewers, lateral drains, or other water infrastructure assets are in existence. Due to the private sewer transfer in October 2011, many newly adopted public used water assets and their history are not indicated on our records. Any encroachment zones should be reflected in the site layout.*

*The development site may contain private water mains, drains or other assets not shown on our records. These are private assets and not the responsibility of Anglian Water but that of the landowner.*

##### **WASTEWATER SERVICES**

##### Section 2 - Wastewater Treatment

*When assessing the receiving Water Recycling Centre's (WRC) Dry Weather Flow (DWF) headroom we take the latest DWF figures, as verified by the Environment Agency and add sites with planning consent to this. Based on the above assessment West Walton WRC is within the acceptance parameters and can accommodate the flows from the proposed growth. Please be advised that Anglian Water cannot reserve future capacity for sites which lack planning consent. Available capacity in our network can be reduced at any time due to growth, increased demand, regulatory changes, and environmental change.*

##### Section 3 - Used Water Network

*If it is the applicant's intention to connect to the Anglian Water public foul network, Anglian Water would object to a connection to our vacuum sewerage system due to the risk of flooding and pollution.*

*In order to overcome our objection, the applicant would need to consult Anglian Water in the form of a Pre -Development Enquiry tier 1 to undertake an assessment to determine available pots and to ensure there is enough pressure to accommodate the development, without adversely impacting or causing detriment to the existing network. In addition, if there is insufficient capacity downstream of the development, upgrade works may be required to the vacuum network, this will be fully funded by the applicant. Once this has been completed, we require the applicant to submit a copy of the agreed strategy in consultation with Anglian Water to the planning authority. All documents should then be submitted to the local planning authority and form part of the planning application.*

*If the Local Planning Authority were minded to approve the planning application, despite our objection, we would recommend a condition which prevents commencement until any required upgrades are completed.*

*Condition: Prior to commencement a scheme for foul drainage works will be submitted to the Local Planning Authority identifying any necessary upgrades. Prior to occupation the identified upgrades must be completed in accordance with the approved scheme. This scheme will identify a sustainable point of connection to the vacuum sewerage system and any necessary upgrades.*

*Reason: To protect water quality, prevent pollution and flooding and secure sustainable development having regard to paragraphs 7/8 and 180 of the National Planning Policy Framework.*

*Vacuum sewerage systems are different to conventional gravity systems in that connections can only be made to a vacuum pot (the chambers on the vacuum system) and not directly to the vacuum pipework. Vacuum pots have limited capacity and are only able to accept connections from 4 properties, either via direct connections to the pot or to a rider sewer (a gravity sewer already connected to a pot). Connections into vacuum pots and rider sewers are only permitted via gravity; pumped connections are not permitted to a vacuum sewerage system. Surface water must not under any circumstances be discharged to a vacuum sewer. Alternative arrangements for surface water disposal would need to be explored.*

*Anglian Water is committed to supporting sustainable growth and in doing so we must continue to meet the statutory obligations whilst balancing factors such as climate change and environmental protection.*

#### *Section 4 - 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.*

*Please be advised that there are no public surface water sewers within the vicinity of the proposed development, and therefore Anglian Water will be*

unable to serve the sites surface water disposal requirements. Alternative methods of surface water disposal will need to be investigated such as infiltration techniques or a discharge to a watercourse in accordance with the surface water management hierarchy as outlined in Building Regulations Part H. The alternative is that a new surface water sewer is constructed which is used to convey your surface water to a watercourse or as part of a SuDs scheme, where appropriate. Subject to the sewer being designed in accordance with the current version of Sewers For Adoption, the sewer can be put forward for adoption by Anglian Water under Section 104 of the Water Industry Act 1991. If the outfall is to a watercourse, the applicant will be required to obtain consent to discharge via the appropriate body. If your site has no means of drainage due to third party land then you may be able to requisition Anglian Water, under Section 98, to provide a connection to the public sewer for domestic drainage purposes. As part of this option, you may wish to enter into a works agreement in accordance with Section 30 of the Anglian Water Authority Act 1977. This will allow you to design and construct the public sewer using Anglian Waters' statutory powers in accordance with Section 159/168 of the Water Industry Act 1991.

#### 5.6. **Environment & Health Services (FDC)**

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, be affected by ground contamination or adversely impact the local amenity due to excessive artificial lighting.

In the event that Permission in Principle (PIP) is granted and a further application for the site is submitted in the future, owing to the scale of the proposed development and close proximity to existing residents, this service requests the submission of a robust Construction Environmental Management Plan (CEMP) in line with the template for developers, available on Fenland District Council's website at: [Construction Environmental Management Plan: A template for development sites \(fenland.gov.uk\)](http://fenland.gov.uk) The CEMP shall be expected to include working time restrictions to negate the need for a separate condition.

#### 5.7. **Local Residents/Interested Parties**

##### Objectors

The LPA received 4 letters of objection to the scheme, all received from address points within High Road, Gorefield. Of the objections received, the following matters were put forward as reasons for objection:

Objecting Comments	Officer Response
<ul style="list-style-type: none"> <li>Overdevelopment</li> <li>Out of character with the area</li> <li>Gorefield village has met building requirements</li> </ul>	Matters of the principle of development, location, use and amount are discussed in the below assessment.
<ul style="list-style-type: none"> <li>Drainage concerns</li> </ul>	Matters relating to flood risk and drainage are discussed in the below assessment.
<ul style="list-style-type: none"> <li>Highway safety concerns</li> </ul>	Matters relating to highway safety, sustainability and infrastructure are

	discussed in the below assessment.
<ul style="list-style-type: none"> <li>Residential amenity concerns</li> </ul>	Matters relating to residential amenity are discussed in the below assessment.
<ul style="list-style-type: none"> <li>Disruption during construction</li> </ul>	Matters of disruption during construction is not a material planning consideration and as such are not discussed in the below assessment.

### Supporters

The LPA received 8 letters of support for the scheme, from address points as follows:

- 2 from residents of High Road, Gorefield;
- 1 from a resident Cattle Dyke, Gorefield;
- 1 from a resident at Fendyke Lane, Gorefield;
- 2 from residents of Gote Lane, Gorefield;
- 1 from a resident of Glebe Close, Gorefield; and
- 1 from a resident of Middle Road, Tydd St Giles;

Of the letters of support received, the following matters were put forward as reasons to support the scheme:

Supporting Comments	Officer Response
<ul style="list-style-type: none"> <li>Would improve streetscene</li> <li>Infill development</li> </ul>	Matters of the principle of development, location, use and amount are discussed in the below assessment.
<ul style="list-style-type: none"> <li>Will bring vitality to the village and improve viability of local services</li> <li>Good for local economy</li> </ul>	Matters relating to sustainability and infrastructure are discussed in the below assessment.

One letter received gave no specific reasons, merely stating that they support the scheme. A further letter stated, *"Will not impact me at all so I have no objections at all"*.

## **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) and the Cambridgeshire and Peterborough Minerals and Waste Local Plan (2021).

## **7 POLICY FRAMEWORK**

- 7.1. **National Planning Policy Framework (NPPF) 2024**  
Chapter 2 - Achieving sustainable development



Chapter 4 – Decision-making  
Chapter 5 – Delivering a sufficient supply of homes  
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

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

Determining a Planning Application

**7.3. National Design Guide 2021**

Context  
Identity  
Built Form  
Movement  
Nature  
Homes and Buildings  
Resources  
Lifespan

**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  
LP4 – Housing  
LP5 – Meeting Housing Need  
LP12 – Rural Areas Development Policy  
LP14 – Responding to Climate Change and Managing the Risk of Flooding  
LP15 – Facilitating the Creation of a More Sustainable Transport Network  
LP16 – Delivering and Protecting High Quality Environments  
LP19 – The Natural Environment

**7.5. Cambridgeshire and Peterborough Minerals and Waste Local Plan 2021**

Policy 14 - Waste management needs arising from residential and commercial Development

**7.6. Delivering and Protecting High Quality Environments in Fenland SPD 2014**

DM3 – Making a Positive Contribution to Local Distinctiveness and character of the Area

**7.7. Cambridgeshire Flood and Water SPD 2016**

**7.8. 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  
LP12: Meeting Housing Needs  
LP18: Development in the Countryside  
LP19: Strategic Infrastructure  
LP22: Parking Provision  
LP23: Historic Environment  
LP24: Natural Environment  
LP25: Biodiversity Net Gain  
LP32: Flood and Water Management

## **8 KEY ISSUES**

- **Location**
- **Use**
- **Amount of Development Proposed**
- **Additional Matters Raised During Consultation**

## **9 ASSESSMENT**

- 9.1. Noting the guidance in place regarding Permission in Principle submissions assessment must be restricted to (a) location, (b) use and (c) amount and these items are considered in turn below:

### **Location**

#### Principle, Form and Character

- 9.2. Generally, the principle of residential development on this site isn't automatically supported. The land is not allocated for housing in the adopted Fenland Local Plan (2014), and the Council can currently demonstrate a healthy housing land supply of 6.6 years. As such, the national "tilted balance" (set out in paragraph 11(d) of the NPPF) doesn't apply in this case. Accordingly, there is no automatic presumption in favour of granting permission. As such, decisions should be based firmly on how well the proposal aligns with local and national planning policies.
- 9.3. Policy LP3 sets out the spatial strategy, settlement hierarchy, and approach to elsewhere developments. This is complemented by Policy LP4 which sets out proposed housing targets for Market Towns and Other Locations. The key driver of these policies is to ensure that new development is directed towards the most sustainable locations whilst recognising that smaller settlements will still need to reflect natural population change and may require additional development of a much smaller scale to reflect these changes. Since the Plan was adopted there have been a number of sites permitted and completed in other locations dramatically exceeding the anticipated provision set out in the adopted Plan with no notable improvements to social,

educational and health infrastructure to offset the impacts of development or increase the overall sustainability of these locations. As such the principal of additional residential development within 'Other Locations' should not be automatically accepted.

- 9.4. The site is located on the edge of Gorefield which has been identified as a 'small village' within the settlement hierarchy outlined in Policy LP3, where only limited development, normally residential infill or small business opportunities, would be supported. Development must also comply with the more detailed policy criteria set out in Policy LP12 Part A as well as LP3. In recent years the built footprint of the village has sprawled out into the open countryside in a westwardly direction, eroding the gentle transition into the village. In particular, application F/YR23/0548/O has extended the built form of the village up to Hassock Hill Drove. This development of 5 dwellings lies immediately to the south of the application site, which when coupled with the proposed development of up to a further nine dwellings, would be akin to a small village extension of up to 14 dwellings into the open countryside. Accordingly, it is considered that development of this site will further consolidate the built form to an extent that the character of the location is eroded by virtue of this urbanisation.
- 9.5. It is also acknowledged that the village threshold for Gorefield of 33 units has been breached, noting that since April 2011 (as per the Village Thresholds Position Statement 23 Oct 2025) 85 units have either been built/or are committed to be built. Policy LP12 identifies that in such scenarios demonstrable evidence of 'local support' should be presented, in this regard it is noted that the Parish Council and four Gorefield households (from High Road) have raised objection to the scheme with seven Gorefield (six from further afield), and one Tydd St Giles households writing in support. It is accepted that Policy LP12 of the Fenland Local Plan 2014 states that the proposal should have demonstrable evidence of clear local community support for the scheme (with such support generated via a thorough and proportionate pre-application community consultation exercise or a Neighbourhood Plan exercise) which has not been undertaken by the applicant. Taking a literal approach to LP12 part A, a lack of support is considered a technical breach of this policy, and this conflict weighs negatively against the scheme. However, this weight is tempered considerably by earlier appeal decisions where a similar breaches were not considered be sufficient to warrant a reason for refusal by the Planning Inspector and when considering the more significant policy conflicts by virtue of the conflict with the settlement hierarchy and the impact of the proposal on the character of the area, that are given significant negative weight.
- 9.6. The current Local Plan does not rely on defined settlement boundaries but rather requires a physical assessment to be made to determine whether or not a site is within a village for the purposes of Policy LP12. Policy LP12 identifies that to receive support, the site must be in or adjacent to the existing developed footprint of the village, defined as the continuous built form of the village and excludes individual buildings and groups of dispersed, or intermittent buildings, that are clearly detached from the continuous built-up area of the settlement and relate more to the open countryside.

- 9.7. Policy LP12 Part A also requires sites to satisfy additional criteria, including:  
(c) It would not have an adverse impact on the character and appearance of the surrounding countryside and farmland and (d) is of a scale and in a location that is in keeping with the core shape and form of the settlement.
- 9.8. In addition, Policy LP16 (d) refers to development making a positive impact to local distinctiveness and the character of the area and amongst other things should not have an adverse impact on landscape character. It is also a core planning principle in the NPPF that recognises the intrinsic value of the countryside therefore consideration needs to be given to any harm caused.
- 9.9. The transition from countryside to village is clearly marked by the current built form that runs along High Road; with sporadic development beyond the site to the north and west and significant areas of open agricultural land, of which the site is part. Development of this site would therefore have a significant detrimental impact on the remaining rural character of Hassock Hill Drove by advancing residential development north and eastwards into open land. As such, it is considered that the proposal is contrary to Policy LP12 Part A (c).
- 9.10. It is considered that the development of this site with 9 dwellings would consolidate the built form to a scale and extent that the character of the area will be unacceptably eroded beyond the core shape of the village along High Road, contrary to Policy LP12 Part A (d) and would have a damaging urbanising impact on the character of the area, contrary to Policy LP16 (d) of the Fenland Local Plan and Policy DM3 of Delivering and Protecting High Quality Environments in Fenland SPD.

#### Flood Risk

- 9.11. Another pertinent requirement is to ensure that development is located in areas of lowest flood risk.
- 9.12. Policy LP14 of the Fenland Local Plan (2014) and chapter 14 of the National Planning Policy Framework set out the policy approach towards development in areas of flood risk. Policy LP14 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, 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.
- 9.13. National planning policy includes an over-arching principle in the Framework that development should be directed away from areas at highest risk of flooding. To that end, a sequential, risk-based approach is to be taken to individual applications in areas known to be at risk now or in the future from flooding. Planning Practice Guidance (PPG) confirms that this means

avoiding, so far as possible, development in current and future medium and high flood risk areas. The PPG furthermore confirms that the underlying purpose includes placing the least reliance on measures like flood defences, flood warnings and property level resilience features. Therefore, even where a flood risk assessment shows the development can be made safe throughout its lifetime without increasing risk elsewhere, the Sequential Test still needs to be satisfied.

### *Sequential Test*

- 9.14. It is for the decision-maker to consider whether the Sequential Test is passed, with reference to information held on land availability and an appropriate area of search. The latter should be determined by the planning authority. Accordingly, clarification on the LPA's expected area of search for a sequential test is now provided on the Council's website, which states:

*“Applicants must define and justify an appropriate area of search when preparing the Sequential Test. The extent of this area will depend on the location and role of the settlement, as well as the type and scale of development proposed:*

- For developments within or adjacent to Market Towns and Growth Villages, the area of search will normally be limited to land within or adjacent to the settlement in which the development is proposed.*
- For all other locations — including Limited Growth, **Small** and Other **Villages**, or Elsewhere Locations — the area of search will normally be expected to be **district-wide**. (Emphasis Added)*

*To pass the Sequential Test, applicants must demonstrate that there are no reasonably available sites, within the defined search area, with a lower probability of flooding that could accommodate the proposed development. A poorly defined or unjustified area of search may result in the Sequential Test being considered invalid.”*

- 9.15. The application includes a Sequential and Exception Test report (dated 09 October 2025) which focuses the area of search on the settlement of Gorefield. However, the above is clear in that the area of search for sites within Small Villages will normally be based on a district wide search area, unless it can be demonstrated that there is a particular need for the development in that location.
- 9.16. The application is not supported by any evidence to justify the need for development in this location and accordingly does not qualify for any variation to the required area of search.
- 9.17. The Council is able to demonstrate a five-year housing land supply, and there remain sites identified as suitable for development in the Local Plan that do not currently benefit from planning permission. It would, therefore, be reasonable to conclude that on the basis of district wide search, there will be other reasonably available sites in Flood Zones 1 and 2 to accommodate 9 dwellings. As such, it is considered that the Sequential Test is failed.

- 9.18. Notwithstanding the above, the submitted Sequential Test concludes that there are no reasonably available sites to accommodate the development in an area of lesser flood risk within Gorefield. The Sequential Test considers a number of sites, such as F/YR25/0473/O, which sought outline approval for up to 9 dwellings (the same quantum as the current PIP application). However, this application was discounted by the applicant, stating *“The design drawing is stated within the planning approval and on the design drawing this references single storey dwellings which this application site is for two storey dwellings. This site is therefore not available due to the single storey dwellings stated on the drawing referenced in the outline approval.”*
- 9.19. Notwithstanding, it must be considered that this stage 1 Permission in Principle application is merely focused on establishing whether a site is suitable in principle as such details such as whether dwellings are single or two storey are immaterial to this application, as such details are not committed at this stage.
- 9.20. Accordingly, in either case, it is considered that insufficient assessment has been undertaken and inadequate information submitted to demonstrate that it is not possible for the development to be located on a site with a lower risk of flooding when considering reasonably available sites within the wider district or Gorefield specifically. On this basis, it is considered that the proposal is not in accordance with Policy LP14 of the Fenland Local Plan, 2014, and Chapter 14 of the National Planning Policy Framework, 2024.

#### *Exception Test*

- 9.21. Notwithstanding the failure of the sequential test, had this been deemed as passed it would then be necessary for the application to pass the Exception Test, which comprises of demonstration of the following:
- (a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and
  - (b) the development 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.
- 9.22. In respect of (a); In order to pass the Exception Test the proposal must provide wider sustainability benefits i.e., beyond merely the application site, for the community. Examples of benefits beyond the application site may include:
- Visually enhance a site to the benefit of the character of an area;
  - Link development to existing services and facilities bringing communities together sustainably;
  - Relocate an existing use closer to existing public transport hubs, thus reducing the amount of traffic on the road; or
  - Providing community facilities

All these examples would likely provide some benefit to the community beyond the application site.

- 9.23. To address the exception test, the application includes the following proposals:
- (1) The proposal at this site is for air source heat pumps and solar panels to the roof and dwellings that are insulated in accordance with Building Regulations with a further enhancement of triple glazing.
  - (2) It is expected that the dwellings would be a minimum of B EPC rating.
  - (3) The proposals would comply with Building Regulations.
- 9.24. The application, as a stage 1 Permission in Principle, does not commit details in respect of (1) – (3) above. However, it is acknowledged that should these elements come forward within the Technical Details stage, these may contribute to renewable energy usage in line with the sustainability objectives of the NPPF.
- 9.25. In respect of part (b) of the Exception Test; The inclusion of flood mitigation measures including raised finished floor levels and flood resilient construction measures within the proposal are highlighted within the flood risk assessment technically address the need for safety in times of flooding at the site, and as such would likely satisfy the Exception Test in this regard.

#### *Drainage*

- 9.26. Concerns relating to appropriate drainage have been expressed by residents.
- 9.27. The applicant contests that surface water can likely be managed through soakaways, on the basis of findings following satisfactory percolation tests for the development to the south (F/YR23/0548/O), which may be an acceptable solution.
- 9.28. It is noted that, in respect of foul water drainage, Anglian Water object to a connection to our vacuum sewerage system due to the risk of flooding and pollution, should it be the applicant's intention to connect to the Anglian Water public foul network. They note that upgrades to this system may be required to ensure foul water from the site can be accommodated appropriately, and as such recommend early engagement with the applicant to discuss their requirements.
- 9.29. Notwithstanding, matters of surface and foul water disposal will be reserved for consideration within any forthcoming Technical Details application.

#### Sustainability concerns

- 9.30. It is noted that an objection was raised by the highways authority in respect of the principle of development for residential use, owing to the unacceptable visibility splays provided and lack of appropriate footway infrastructure, given the quantum of development proposed, that may give rise to issues of highway safety and would conflict with the environmental objective of sustainable development as the intended occupants of the dwellings will be reliant on private modes of transport to access local facilities and services. As such the scheme fails to represent sustainable development in this regard and is contrary to Paragraph 8 of the NPPF and Policy LP1 which sets out the presumption in favour of sustainable development in line with the Framework.

This bolsters the view that there will be significant adverse impacts accruing in terms of the scheme's sustainability in locational terms.

#### Location Conclusion

- 9.31. The above assessment considers the application site for the development of up to 9 dwellings on an area of land located outside the developed footprint of Gorefield, resulting in unacceptable incursion into the open countryside, harm to the rural character, is positioned in an area of highest flood risk and in an unsustainable location. Thus, the location of the scheme is considered contrary to Policies LP3, LP12, LP14 and LP16 and thus Permission in Principle should be refused on this basis.

#### **Use**

- 9.32. The site is situated close to existing development in the open countryside, however as stated above, it will be contrary to Policy LP12 – Rural Areas Development Policy and Policy LP16 – Delivering and Protecting High Quality Environments across the District. The introduction of up to 9 new residential dwellings is considered to erode the character and appearance of the rural area. It is therefore considered that the site is not acceptable to use for new dwellings.
- 9.33. In addition, whilst perhaps being a matter more appropriate for consideration at Technical Consent stage, the use of the land for residential purposes, in principle, would not likely give rise to unacceptable impacts on surrounding residents by reason or noise or disturbance or vice versa.
- 9.34. Supporters state that the housing will help bring vitality to the village and improve viability of local services, and be good for local economy, however, that does not justify development in an unsustainable location in Flood Zone 3.

#### **Amount of Development Proposed**

- 9.35. The application seeks Permission in Principle for up to 9 dwellings on a site of approximately 0.5ha which would equate to a density of approximately 18 dwellings per hectare, if the full quantum was advanced.
- 9.36. Noting established development locally, along High Road, densities range from approximately 3.2 dwellings per hectare along the northern side, and 8 dwellings per hectare along the southern side. Accordingly, the proposed density of 18 dwellings per hectare is considered to amount to overdevelopment and would result in inappropriate urbanisation of the area, especially when cumulatively viewed alongside the recent development to the south.

#### **Additional Matters Raised During Consultation**

- 9.37. **Highway safety** – Notwithstanding the locational sustainability concerns discussed above, specific details regarding safe and convenient access, such as matters regarding visibility splays, parking, turning and thus highway safety would need to be fully reconciled at the Technical Details stage to ensure the scheme complies with Policy LP15. It is however considered that, noting comments received from the Highways Authority with concerns to highway



safety regarding the deliverability of suitable visibility splays, compliance with Policy LP15 may not be achieved at a more detailed stage.

- 9.38. **Impact on biodiversity/BNG** – The LPA duty under Section 40 of the Natural Environment and Rural Communities Act 2006 as amended, has been considered.

In other application types such as outline and full applications, an ecological survey and if necessary further species surveys would be needed up front to accompany the application. This Permission in Principle application, if successful, would not be granting planning permission.

Ecological information should be submitted at the Technical Details stage (if this first stage were successful) and considered then, consulted upon and the decision, including potential refusal or conditions, should be based upon the findings of said ecological information.

If this stage of Permission in Principle were successful, it would not prevent proper consideration of ecological issues at the next stage and it would not alter duties of landowners/developers to comply with other legislation such as the Wildlife and Countryside Act in the meantime.

The grant of permission in principle is not within the scope of biodiversity net gain (as it is not a grant of planning permission), but the subsequent Technical Details consent (as a grant of planning permission) would be subject to the biodiversity gain condition, unless appropriate exemptions were to apply.

- 9.39. **Residential Amenity** – Some public comments received raise matters of impacts to residential amenity; however, these are matters that could only be determined at the Technical Details stage. It should also be noted that disturbance during construction, the devaluation of properties and the loss of views are not matters attributed material planning weight.
- 9.40. **Economic benefits** – Comments have been received that new housing will create temporary employment and contribute to the local economy. It is recognised that the construction of the development would provide some employment for the duration of the work contributing to a strong responsive and competitive economy. Whilst it could also be argued that there may be some potential for increased expenditure by occupants when utilising local facilities, the limited facilities on offer are such that this does not render the site location as sustainable. As noted above, there is a direct correlation between the aims of the Fenland Local Plan and the NPPF and a clear planning argument to resist this development as being in an unsustainable location.
- 9.41. **Contributions** – The applicant provided a confidential preliminary S106 Heads of Terms document to the LPA with proposals to offer community improvements in light the proposed development. The confidential details of this document have not been shared with Members by virtue that there is no legal mechanism within Permission in Principle applications to secure planning obligations, and as such these can be given no weight in decision

making. Should the applicant have sought to provide community improvements, the appropriate mechanism would have been to submit a full planning application to the LPA, whereby the relevant Fenland Local Plan Policies (LP5 and LP13) that seek to secure appropriate infrastructure contributions and/or affordable housing where necessary could be applied in the planning balance.

- 9.42. **Additional considerations** – No conditions can be attached to a grant of Permission in Principle in accordance with the NPPG advice (Paragraph: 020 Reference ID: 58-020- 20180615).

## **10 CONCLUSIONS**

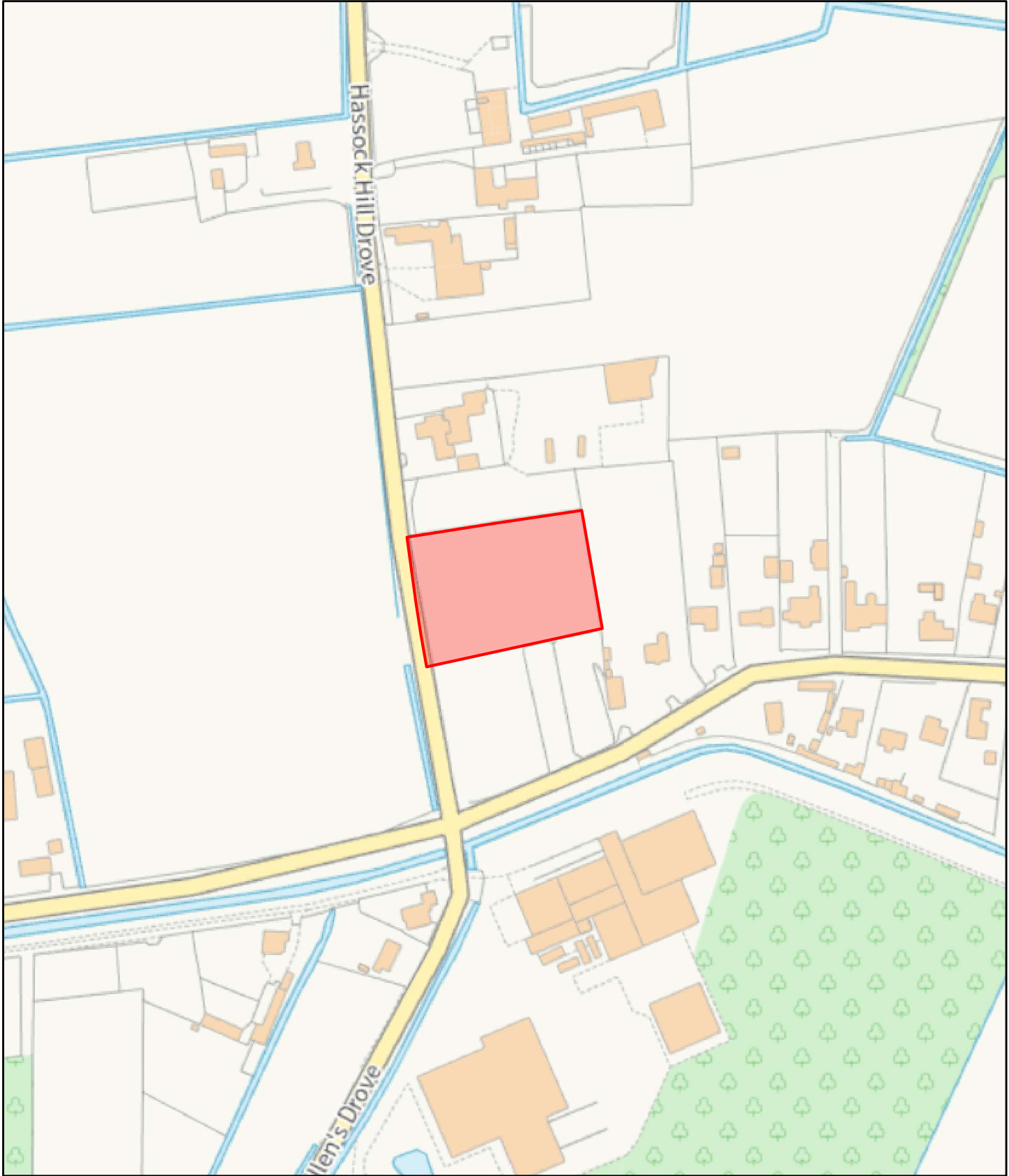
- 10.1. As indicated above it is only location, use and amount of development that may be considered at the first 'permission in principle stage'.
- 10.2. The above assessment considers that the location of the site for residential development is unacceptable due to the conflict with the settlement hierarchy of the Local Plan and unacceptable incursion of urbanisation into the open countryside, contrary to Policies LP3, LP12, and LP16. In addition, the site lies entirely within in Flood Zone 3; Policy LP12 Part A (j) seeks to ensure that developments would not put people or property in dangers from identified risks, such as flooding. Policy LP14 of the Fenland Local Plan and Chapter 14 of the NPPF seek to steer developments to the areas with the least probability of flooding and development will not be permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding.
- 10.3. Furthermore, it is considered that the amount of development proposed results in overdevelopment and is contrary to paragraph 8 of the NPPF.
- 10.4. While it is recognised that the development of the site may deliver some economic and social benefits it is not considered that these would outweigh the overall unsustainable and inappropriate nature of the site or its conflict with the relevant local and national policies.

## **11 RECOMMENDATION**

**Refuse;** Permission in Principle for the following reasons:

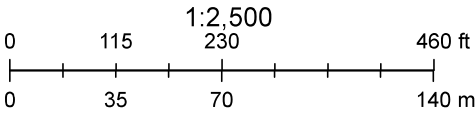
1	Policy LP3 of the Fenland Local Plan (2014) sets out the settlement hierarchy within the district, and Policy LP12 details a range of criteria against which development within the District will be assessed. The site is located on the edge of Gorefield which has been identified as a 'small village' within the settlement hierarchy outlined in Policy LP3, where only limited development, normally residential infill or small business opportunities, would be supported. The proposal will introduce development of up to nine dwellings into an area that currently has a strong relationship with the adjoining countryside and when considered cumulatively with the recent development to the south, would be akin to a small village extension resulting in an unacceptable urbanisation of the rural area. Thus, the proposal
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	therefore fails to comply with Policies LP3 and LP12 of the Fenland Local Plan 2014. in terms of location and use, the Planning in Principle application fails.
2	<p>Policy LP12 of the Fenland Local Plan 2014 seeks to ensure that development does not result in an adverse impact on the character and appearance of the surrounding countryside and Policy LP16 (d) of the Fenland Local Plan (2014) requires development to deliver and protect high quality environments specifying that development should make a positive contribution to the local distinctiveness and character of the area. The development proposed would see up to five dwellings and associated infrastructure positioned on undeveloped agricultural land that currently positively contributes to the distinct and natural character beyond the built form of High Road Gorefield. Development on this land would bring a distinctly urbanising effect to the detriment of the character and appearance of the area, directly contradicting the current settlement pattern, contrary to the requirements of Policies LP12 and Policy LP16(d) and paragraphs 135 and 187 of the NPPF, and thus, in terms of location and use, the Planning in Principle application fails.</p>
3	<p>The site lies entirely within in Flood Zone 3; Policy LP12 Part A (j) seeks to ensure that developments would not put people or property in dangers from identified risks, such as flooding. Policy LP14 of the Fenland Local Plan and Chapter 14 of the NPPF seek to steer developments to the areas with the least probability of flooding and development will not be permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding.</p> <p>The application is not accompanied by a substantive sequential test and as such insufficient assessment has been undertaken and inadequate information submitted to demonstrate that it is not possible for the development to be located on a site with a lower risk of flooding and as such the development is contrary to the aforementioned policies.</p>
4	<p>If the principle of residential development on this site were acceptable in terms of location and use of land, development of up to 9 dwellings would result in overdevelopment and as such would not constitute sustainable development in accordance with paragraph 8 of the NPPF, and thus, in terms of amount of development proposed, the Planning in Principle application fails.</p>



10/28/2025, 9:01:35 AM

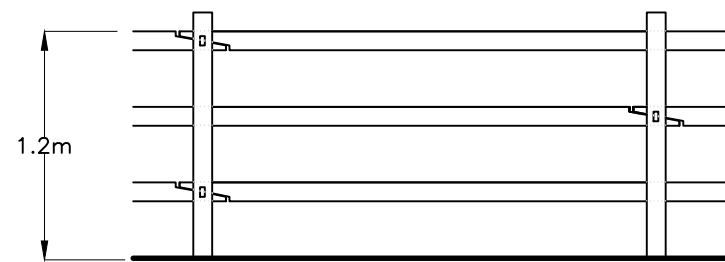
 Fenland District Boundary



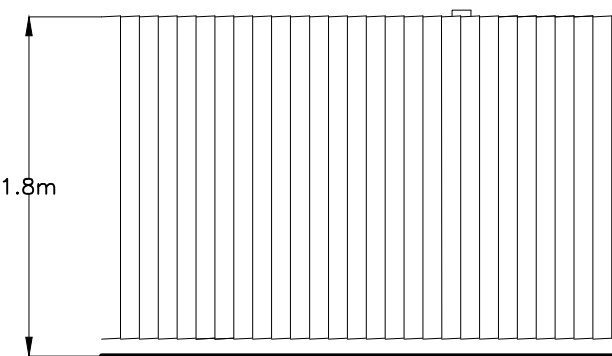
Fenland District Council



- LEGEND
- PLOT 1 = 4No BEDROOMS TWO STOREY  
PLOT 2 = 4No BEDROOMS TWO STOREY  
PLOT 3 = 4No BEDROOMS TWO STOREY  
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PLOT 6 = 4No BEDROOMS TWO STOREY  
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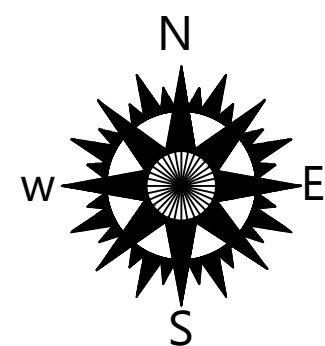


TIMBER POST AND  
RAIL FENCE DETAIL  
(1:50)

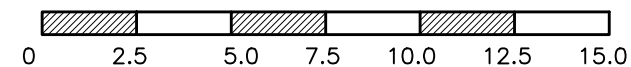


1.8m HIGH TIMBER  
FENCE DETAIL  
(1:50)

NEW ACCESS TO BE 5.5m wide x  
10m LONG LAID TO FALL AWAY  
FROM THE HIGHWAY TO CAMBS  
COUNTY COUNCIL STANDARDS



PROPOSED SITE PLAN 1:200



Hassock Hill Drove

SWANN LODGE

Access

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Hassock Hill Drove

PRIVATE DRIVE

PRIVATE DRIVE

FIVE PLOTS APPROVED F/YR23/0548/O (UNDER CONSTRUCTION)

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Please read, if in doubt ask. Change nothing without consulting the Engineers.  
Contractor to check all dimensions on site before work starts or materials are ordered. If in doubt ask. All dimensions are in mm unless stated otherwise.  
Where materials, products and workmanship are not fully specified they are to be of the standard appropriate to the works and suitable for the purpose stated in or reasonably to be inferred from the drawings and specification. All work to be in accordance with good building practice and BS 8000 to the extent that the recommendations define the quality of the finished work. Materials, products and workmanship to comply with all British Standards and EOTA standards with, where appropriate, BS or EC marks.  
All products and materials to be handled, stored, prepared and used or fixed in accordance with the manufacturers current recommendations.  
The contractor is to arrange inspections of the works by the BCO (or NHBC) as required by the Building Regulations and is to obtain completion certificate and forward to the Engineer  
All finishes, insulation and damp-proofing to architect's details

LEGEND

- PERMEABLE TARMAC GRASS
- PERMEABLE BLOCK PAVING
- PATHS/PATIO AREA
- GRAVEL (PERMEABLE COVERING)
- SOLAR PANELS TO ROOF
- APPLICATION SITE
- HOUSEHOLDER BIN LOCATIONS
- 3m x 5.5m PARKING SPACE
- FIRE APPLIANCE
- BCP = BIN COLLECTION POINT

A CLIENTS COMMENTS		SEPT 25
REVISIONS		DATE
<b>MORTON &amp; HALL</b> CONSULTING LIMITED CONSULTING STRUCTURAL ENGINEERS 1 Gordon Avenue, Tel: 01354 655454 March, Fax: 01354 660467 Cambridgeshire, E-mail: info@mortonandhall.co.uk PE15 8AJ Website: www.mortonconsultingengineers.co.uk		
		
CLIENT McDermott Residential Property Limited		
PROJECT Land South of Swan Lodge Hassock Hill Drove Gorefield, Wisbech PE13 4QF		
TITLE Proposed Site Plan INDICATIVE LAYOUT		
DRAWN MH	DATE OF ISSUE	
CHECKED	DATE	
DATE September 2025	DRAWING NUMBER H10638/04_A	
SCALE A1 1:200		