

**Applicant: Mr A Udell & Mr E Hackett**

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

**Bunkers House, High Road, Bunkers Hill, Wisbech Cambridgeshire PE13 4SQ**

**Permission in principle for 7 x dwellings**

**Officer recommendation: Refuse**

**Reason for Committee: Referred by Head of Planning on advice of Committee Chairman.**

---

## **1 EXECUTIVE SUMMARY**

- 1.1 This application seeks Permission in Principle for the erection of up to seven dwellings on land to the rear of Bunkers House and Mizpah, located off High Road, Bunkers Hill. The site comprises approximately 0.96 hectares of agricultural land situated outside the defined settlement hierarchy within an Elsewhere location and lies within Flood Zone 3.
- 1.2 Bunkers House is a non-designated heritage asset, with historic use as a poorhouse/workhouse from 1818 and important surviving features, making it a strong candidate for the Cambridgeshire Local List. The site forms part of the agricultural setting and visual transition of the hamlet, which contributes positively to the significance of Bunkers House.
- 1.3 The development is considered unacceptable in terms of location and heritage impact, due to its unsustainable position beyond the established developed footprint of the hamlet, its encroachment into open countryside, the associated harm to rural character, and the detrimental impact on the setting of the non-designated heritage asset. In addition, the applicant has failed to satisfactorily demonstrate compliance with the Sequential Test and part (a) of the Exception Test in flood risk terms.
- 1.4 Whilst the proposed residential use is, in principle, compatible with surrounding land uses and would not give rise to unacceptable amenity impacts at this stage, the proposal fails the location requirements of Permission in Principle.
- 1.5 For these reasons, including the harm to the setting of a non-designated heritage asset, the unsustainable location and flood risk concerns, the proposal is recommended for refusal.

## **2 SITE DESCRIPTION**

- 2.1 The application site is located to the north of High Road, to the rear of Bunkers House and Mizpah. To the east, the surrounding area is predominantly residential

in character, while to the south-west and south the landscape is largely rural with limited built development. The site lies outside the defined settlement boundary and is therefore classified as an 'Elsewhere' location, with Wisbech St Mary as the closest settlement. It is also situated within Flood Zone 3.

2.2 Bunkers Hill is a small hamlet comprising approximately 25 dwellings. The existing built form is predominantly individual in nature, with varied architectural styles that reflect the incremental and organic evolution of development within the hamlet.

### **3 PROPOSAL**

3.1 The current proposal is the first part of the Permission in Principle application; this "first stage" establishes whether a site is suitable in principle only and assesses the "principle" issues, namely;

1. Location
2. Use, and
3. Amount of development proposed

3.2 Should this application be successful the applicant would have to submit a Technical Details application covering all the other detailed material planning considerations. The approval of Permission in Principle does not constitute the grant of planning permission.

3.3 The applicant is only required to submit minimum information to accompany the application. However, an Indicative Site Plan has been submitted. Permission in principle is sought for the erection of seven dwellings. From the Indicative Site Plan provided, the development would utilise the existing access serving Bunkers House, with the access road wrapping around the site and three dwellings positioned on each side, with the seventh located to the west of the existing dwellings, fronting High Road.

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 There is no recent relevant planning history regarding the site as outlined in red.

### **5 CONSULTATIONS**

#### **5.1 Wisbech St Mary Parish Council**

The parish council recommends refusal on the following grounds:

- Does not comply with policy LP12 given elsewhere location
- Amount – too large for backland development
- Concerns regarding traffic

#### **5.2 Conservation Officer**

Bunker House is a non-designated heritage asset and its historic use as a poorhouse/workhouse from 1818 alongside important historic features makes it a

strong candidate for the Cambridgeshire local list. A housing development to the rear would negatively impact the building's setting and countryside views.

### **5.3 FDC Environmental Services – Refuse**

Does not object in principle but raises a number of recommendations for consideration at technical details stage should this application be approved.

### **5.4 Anglian Water**

No objection but raises a number of recommendations for consideration at technical details stage should this application be approved

### **5.5 Local Residents/Interested Parties**

Twenty Five letters of objection have been received from residents of Bunkers Hill, plus from Magazine Lane, Mile Tree Lane and Common Road, Wisbech, Stephensons Close, March, New Peached Lane, Crowley and Riverdale Road, Erith. These comments are summarised below:

<b>Objecting Comments</b>	<b>Officer Response</b>
Anti social behaviour	Comments noted. However, this does not form part of the consideration at this stage and would be addressed at technical details stage should this application be approved.
Cramped/ Out of Character	Comments noted and discussed below where relevant. However, detailed design does not form part of the consideration at this stage and would be addressed at technical details stage should this application be approved.
Lack of Demand	Comments noted.
Traffic and Highway Safety	Comments noted and discussed below.
Loss of Privacy	Comments noted. However, this does not form part of the consideration at this stage and would be addressed at technical details stage should this application be approved.
Noise nuisance	Comments noted. However, this does not form part of the consideration at this stage and would be addressed at technical details stage should this application be approved.
Value of properties impacted in the area	Comments noted. However, this is not a material planning consideration
Additional pressure on local services and water supply	Comments noted and where relevant discussed below. However, this is something that could be dealt with at the Technical Details stage should the application be approved.
Impact on natural features	Comments noted and discussed

	below.
Impact on Heritage Assets – The Poor House	Comments noted and discussed below.
Housing mix/type inappropriate	Comments noted and discussed below.
Overshadowing	Comments noted. However, this does not form part of the consideration at this stage and would be addressed at technical details stage should this application be approved.
Impact wellbeing of special characteristic.	Comments noted and discussed below.
Air Quality concerns	Comments noted. However, this does not form part of the consideration at this stage and would be addressed at technical details stage should this application be approved.

Twenty-Two letters of support for the proposal have been received from residents at Limes Avenue (Elm), Atlantic Close and Upwell Road (March), High Road and Church Road (Wisbech), Wildfields Road (King's Lynn), High Street (Long Sutton), Topcliffe (Thirsk), Caistor Road (Corby), Chapel Street (Stanground), Shepherds Mouth Lane (Huyhirn), Beech Lane (Barrow), Main Street (Wetherden), Main Street (Melton Mowbray), Elm Park (Whittlesey), Frankel Way (Biggleswade), and Headingley Close (Coalville).

It is worth noting that Four letters pertain to the named Applicants and/or occupants of Bunkers House itself (listed as the applicants address)

<b>Supporting Comments</b>	<b>Officer Response</b>
More Housing in the area / Appropriate growth	Comments noted and discussed below.
Benefit to local services and economy	Comments noted and discussed below
Effective use of land / improvement to area than overgrown unkempt land	Comments noted and discussed below
In keeping with surrounding area	Comments noted and discussed below
Will slow traffic	Comments noted. However, this is largely a matter that would be informed by detailed matters at the Technical Details Stage.
Sustainably located.	Comments noted and discussed below
Larger homes required in the area.	Comments noted and discussed below
Disproportionate number of objections compared to others	Comments noted.
Outlines the purpose of a PIP and confirms nothing about the final for is fixed at this point	Comments noted.
The land can accommodate well-proportioned plots.	Comments noted.
Objections relate to non-material	Comments noted.

planning considerations for this type of application

## 6 STATUTORY DUTY

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

## 7 POLICY FRAMEWORK

### **National Planning Policy Framework (NPPF) 2024**

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

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

Determining a Planning Application

### **National Design Guide 2021**

Context  
Identity  
Built Form  
Movement  
Nature  
Public Spaces  
Uses  
Homes and Buildings  
Resources  
Lifespan

### **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  
LP8 – Wisbech  
LP12 – Rural Areas Development Policy  
LP14 – Responding to Climate Change and Managing the Risk of Flooding in Fenland  
LP15 – Facilitating the Creation of a More Sustainable Transport Network in

Fenland

LP16 – Delivering and Protecting High Quality Environments across the District

LP17 – Community Safety

LP18 – The Historic Environment

LP19 – The Natural Environment

### **Delivering and Protecting High Quality Environments in Fenland SPD 2014**

DM2 – Natural Features and Landscaping Schemes

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

DM4 – Waste and Recycling Facilities

DM6 – Mitigating Against Harmful Effects

### **Cambridgeshire Flood and Water SPD 2016**

## **8 KEY ISSUES**

- **Location**
- **Use**
- **Amount of Development Proposed**

## **9 ASSESSMENT**

### Location

9.1. Policy LP3 establishes the settlement hierarchy within the District. Bunkers Hill is not identified as a settlement within this hierarchy and is therefore classified as an 'Elsewhere' location. In such locations, development is strictly limited to that which is demonstrably essential to the effective operation of local agriculture, horticulture, forestry, outdoor recreation, transport or utility services. The proposal seeks Permission in Principle for seven dwellings, a form of development that is not supported in Elsewhere locations under LP3.

9.2. As stated above, the application site is situated in a rural Elsewhere location beyond the defined settlement hierarchy, with limited access to local services and facilities. The site lies approximately 1.25 km (0.78 miles) from the centre of Wisbech St Mary, which offers only a limited range of services, and around 3 km (1.86 miles) from Murrow, the next nearest village, which similarly provides few facilities. A footpath runs through the hamlet; however, it ends close to the equestrian centre, leaving an approximately 500 m (0.31 mile) stretch without formalised pathing before it reemerges around Rummers Lane. This gap means the route does not provide a convenient or safe link to Wisbech St Mary. While a primary school and a small convenience store lie within approximately 0.8–1 km (0.5–0.6 miles), most key services, including secondary education, GP and hospital provision, supermarkets, major employment areas, and public transport links, are located 2–4 km (1.2–2.5 miles) away. These distances are generally not practical for walking or cycling, meaning residents would be largely reliant on private vehicles. Accordingly, the site performs poorly in sustainability terms with respect to access to services and facilities, consistent with its classification outside the established settlement pattern.

9.3. The site occupies a sensitive edge-of-hamlet position, adjoining open countryside to the west and north. These open fields form part of the rural setting of Bunkers

Hill and make a positive contribution to its small-scale, dispersed character. The proposal would introduce a substantial quantum of built development into an otherwise open agricultural landscape, contrary to LP12 Parts A(c) and (d), which require development to respect settlement form and prevailing landscape character.

- 9.4. The indicative layout demonstrates that the proposal would extend built form west and north into open countryside, resulting in an uncharacteristic encroachment and an erosion of the loose, organic pattern of development that defines the hamlet. The proposal would therefore represent an unsustainable outward expansion rather than a natural consolidation of the existing settlement.
- 9.5. The site is highly visible from High Road and performs an important transition function between the open countryside and the small cluster of dwellings that form Bunkers Hill. The development would result in a marked change from open agricultural land to a built frontage, disrupting this visual transition and materially harming the rural approach to the hamlet.
- 9.6. As the site is within the 'Elsewhere' category of LP3 where residential development is not supported. The proposal is not essential to any rural economic or operational need and is therefore unacceptable in principle.
- 9.7. The proposal is in conflict with LP16 and fails to achieve the high-quality placemaking objectives of paragraph 135(c) of the NPPF, as the back land form of development in an isolated countryside location would neither enhance the sense of place nor respond positively to local character.
- 9.8. Paragraph 187 of the NPPF seeks to recognise and protect the intrinsic character and beauty of the countryside. By introducing a significant quantum of residential development into a visually sensitive rural edge-of-hamlet location, the proposal would undermine this objective.
- 9.9. The planning history of nearby sites is noted as a material consideration. However, the approved schemes within Bunkers Hill are generally located within the more established built-up part of the hamlet. In contrast, the application site occupies a more exposed edge-of-settlement position where open views and agricultural character are fundamental to the setting of the hamlet. The impact of the current proposal is therefore materially different and more harmful in landscape and visual terms.
- 9.10. While matters such as detailed design, access, biodiversity and archaeology could be addressed at the Technical Details stage, they cannot overcome the fundamental objection to the principle of residential development in this location. The harm identified arises directly from the site's location and relationship with the surrounding countryside and therefore remains decisive at the Permission in Principle stage.
- 9.11. The Council can demonstrate a five-year supply of housing land and the relevant policies are consistent with the NPPF. As such, the tilted balance does not apply. There is no overriding housing need that would justify a departure from the Development Plan.
- 9.12. Bunkers House is identified by the Council's Conservation Officer as a non-designated heritage asset. Its historic use as an early 19th-century

poorhouse/workhouse (established 1818), together with surviving architectural features and its relationship with the surrounding rural landscape, give it appreciable historic and communal significance. These characteristics also make it a strong candidate for inclusion on the Cambridgeshire Local List. The open agricultural land to the rear and wider countryside views contribute materially to the ability to understand and appreciate its origins, function, and evolution

- 9.13. Paragraph 208 of the NPPF requires local planning authorities to identify and assess the particular significance of any heritage asset that may be affected by a proposal, including impacts on its setting. This assessment must be informed by the best available evidence and proportionate to the importance of the asset.
- 9.14. Paragraph 211 of the NPPF states that, in weighing applications affecting non-designated heritage assets, a balanced judgement must be made having regard to the scale of any harm and the significance of the asset.
- 9.15. Policies LP16 and LP18 of the Fenland Local Plan require development to respect, conserve and, where possible, enhance the historic environment, including both designated and non-designated heritage assets and their settings
- 9.16. The NPPF Glossary defines setting as "*the surroundings in which a heritage asset is experienced*," noting that its extent is not fixed and may change as surroundings evolve. Planning Practice Guidance (PPG para. 013) confirms that assessments of setting should be proportionate to the asset's significance and the degree of change proposed. Key considerations include:
  - all heritage assets have a setting, designated or not;
  - setting may be influenced by views (long, short, designed or incidental),
  - environmental factors, and historical or functional relationships;
  - public access is not required for setting to contribute to significance;
  - cumulative change must be considered, as incremental harm can erode an asset's significance over time.
- 9.17. Historic England guidance highlights that significance is often conveyed through views, designed, incidental, historical, or cultural and that cumulative development can sever or diminish these relationships.
- 9.18. The proposed housing development would introduce built form into currently undeveloped countryside that forms part of the building's rural historic backdrop. The open fields to the west and north provide an important spatial relationship that reinforces the asset's former institutional function and its historic separation from clustered domestic development. The erosion of these open views and the encroachment of suburban character would diminish the ability to appreciate the building's historic function and its rural context. Accordingly, the proposal would result in harm to the significance of the NDHA through harm to its setting.
- 9.19. In accordance with NPPF paragraph 211, the level of harm is assessed as moderate adverse, falling within "less than substantial harm" in NPPF terms but still carrying significant weight in the planning balance given the asset's local historic importance. Policies LP16 and LP18 require development to respect and conserve the setting of heritage assets, whether designated or not. The introduction of up to seven dwellings in this sensitive rural position would conflict with those requirements.

9.20. While detailed design matters are reserved, the location and amount of development sought under the PIP inherently result in encroachment into the sensitive rural setting of Bunker House. The harm arises from the choice of site and scale of development rather than the absence of detailed design, and therefore cannot be mitigated at Technical Details stage. Having regard to NPPF paragraph 211 and Local Plan Policies LP16 and LP18, the identified heritage harm weighs significantly against the proposal.

9.21. Policy LP14 of the Fenland Local Plan and paragraphs 170–182 of the National Planning Policy Framework set out the approach to development and flood risk. Development should be directed to land at the lowest risk of flooding through the Sequential Test and only permitted in higher risk areas where no reasonably available lower risk sites exist.

9.22. The site lies within Flood Zone 3. A Sequential and Exception Test dated 6 November 2025 and a Flood Risk Assessment dated 3 November 2025 by Morton and Hall Consulting were submitted. A further search of Public Access, Rightmove and estate agents identified four permitted sites, none of which were suitable as they were also in Flood Zone 3, not comparable or already completed. No other sites were identified within Bunkers Hill, with the nearest at Tholomas Drove which was not suitable for seven dwellings.

9.23. Updated Council guidance published in June 2025 clarifies that for Small Villages and Elsewhere locations the Sequential Test search area should normally be district-wide. Applicants must demonstrate that no reasonably available sites exist within this area at a lower risk of flooding. Given the proposal is in an Elsewhere location and the Sequential Test has not been undertaken on a district-wide basis. Given the scale of development exceeds that envisaged for the settlement, a district-wide search remains appropriate and reflects the adopted spatial strategy and housing supply position.

9.24. Although some flexibility may apply where development meets a defined local housing need, no robust evidence has been provided to justify a reduced search area.

9.25. As lower flood risk sites are available elsewhere in Fenland, the Sequential Test is not satisfied. The proposal therefore conflicts with the NPPF, PPG and Policy LP14. Where development cannot be located in lower risk zones, the NPPF allows the Exception Test to be applied. The Exception Test requires:

- a) Wider community sustainability benefits
- b) Development to be safe for its lifetime without increasing flood risk elsewhere

9.26. In relation to limb (a), seven open market dwellings provide negligible wider sustainability benefit, particularly given a 6.6 year housing land supply. Proposed energy efficiency measures are standard and do not constitute substantial public benefits. Limb (a) is not satisfied.

9.27. In relation to limb (b), proposed finished floor levels 0.6 metres above ground level are capable of ensuring the development is safe and does not increase flood risk. Limb (b) is satisfied.

- 9.28. As both limbs of the Exception Test must be met and the Sequential Test has failed, the proposal does not comply with Policy LP14 or national policy. Although the Environment Agency raises no objection, this does not remove the requirement for a compliant Sequential and Exception Test. Insufficient evidence has been provided to demonstrate the site is appropriately located in flood risk terms and the proposal remains contrary to Policy LP14 and the NPPF.
- 9.29. For the reasons set out above, the proposal is contrary to Policies LP3, LP16(c) and (d) and LP14 of the Fenland Local Plan and paragraphs 135, 170–182 and 187 of the National Planning Policy Framework. The scheme is therefore unacceptable in principle due to its unsustainable and harmful location in the open countryside and the failure to satisfactorily demonstrate that the location of the site is suitable for residential development in flood risk terms.

### Use

- 9.30. Policy LP12 ((i) states that development should not result in the loss of high grade agricultural land or if so comprehensive evidence is provided to justify the loss. Paragraph 187 of the NPPF states that decisions should recognise the intrinsic character and beauty of the countryside....including the economic benefits of the best and most versatile agricultural land. Grades 1, 2 and 3a agricultural land fall within this category. A large proportion of agricultural land in Fenland District is best and most versatile land. While there is insufficient information upon which to assess whether the loss the land might mean loss of best and most versatile agricultural land. However, the Council has rarely refused applications for this reason, given the quantity of such land within the District, and it is not considered that this issue could therefore be used as a reason for refusal in this instance.
- 9.31. In considering the proposed residential use in the context of surrounding land uses, it is noted that the immediate area comprises a mixture of residential properties with adjacent agricultural land beyond the hamlet. The introduction of residential development on the site, in principle, would be compatible with the prevailing character of nearby land uses and would not, by its nature, give rise to unacceptable impacts on surrounding occupiers by reason of noise, disturbance, or other environmental harm, nor would the proposed use be unduly affected by neighbouring activities.
- 9.32. As assessed above and notwithstanding the identified locational harm, the application site lies within Flood Zone 3. However, the submitted Flood Risk Assessment demonstrates that appropriate mitigation measures can be provided to address flood risk. This position is supported by the Environment Agency, which has raised no objection to the proposal. Accordingly, in respect of flood risk and the proposed residential use in principle, this matter does not give rise to an objection at the Permission in Principle stage.
- 9.33. The assessment at the Permission in Principle stage is limited to the principle of use only. Accordingly, more detailed matters relating to the protection of residential amenity, including but not limited to privacy, overlooking, overshadowing, layout, scale, and boundary treatments, can be appropriately addressed at the subsequent Technical Details Consent stage should Permission in Principle be granted, as could the amenity afforded to future residents. Any future application would be required to demonstrate full compliance with Policy

LP16 of the Fenland Local Plan and all other relevant amenity and design policies.

Amount

- 9.34. The proposal seeks Permission in Principle for up to seven dwellings on a site measuring approximately 0.96 hectares, equating to a density of approximately 7.3 dwellings per hectare. Whilst the scheme remains under development, it is noted that, given the site's location and rural context, support for a significantly higher density form of development would not be appropriate or acceptable in planning terms. Policies LP12(c) and (d), LP16(d) and paragraph 135 of the NPPF require development to respond positively to local character, which in this location places clear constraints on the intensity of development that could reasonably be supported.
- 9.35. Residential densities within the wider area vary but are generally low, averaging approximately 5.3 dwellings per hectare. Any attempt to materially increase the density on this site in order to maximise land use would risk eroding the established rural character and would conflict with local and national design objectives. As such, the scope to increase density is inherently limited by the site's location and surroundings.
- 9.36. Although the planning system seeks to achieve the efficient use of land as part of the overarching objective of sustainable development set out in paragraph 8 of the NPPF, this objective must be applied in a manner that is sensitive to context. Paragraph 11 of the Framework does not require higher density development in locations where it would be inappropriate or unsustainable. In this case, the site is not in a location where intensified development would support sustainable growth or align with the spatial strategy.
- 9.37. Paragraph 130 of the NPPF seeks development that makes prudent use of natural resources and contributes positively to the environment. In rural locations such as this, prudent use of land does not equate to maximising density where doing so would undermine character, harm the landscape setting or introduce an incongruous form of development.
- 9.38. Accordingly, whilst the proposal remains under development, it is clear that the site's location does not lend itself to a higher density form of development. Any increase in the amount of development beyond that proposed would be unacceptable in principle and would conflict with local and national policy requirements relating to character, design and sustainable development.
- 9.39. Notwithstanding the above, as discussed within the location section of this report, in terms of the landscape and spatial impacts identified, the amount of development proposed, would also intensify the degree of encroachment into the open rural land that forms an important part of the setting of Bunker House, a non-designated heritage asset. The scale of built form envisaged would materially erode the open agricultural backdrop that contributes to the appreciation of the building's historic function and rural character. As the harm arises from the quantum and disposition of development rather than from matters of detailed design, it cannot be mitigated at Technical Details stage. Accordingly, when considering the amount of development sought under the PIP, the proposal would result in harmful change to the setting of Bunker House contrary to Policies LP16

and LP18 and the approach to non-designated heritage assets set out in paragraph 211 of the NPPF.

#### Matters raised during consultation

##### Equality Impact Assessment

9.40. Representations have been received noting that the proposed development could result in specific disadvantage to an individual with a protected characteristic. The concern relates to the potential general change in the environment and character of the locality as a result of the development, and the possible impacts this may have on their well-being.

9.41. In response, a bespoke Equality Impact Assessment has been undertaken in line with the Council's Public Sector Equality Duty under the Equality Act 2010. This assessment is held on the planning record and considers the potential for the development to adversely affect individuals with autism or other protected characteristics through changes to noise, visual character, or local activity patterns.

9.42. Given the nature of the concerns, it is acknowledged that the development would introduce a significant change to the open and rural setting of the site, which could have impacts. However, no specific mitigation is proposed as the impacts relate to the general change in environment rather than a manageable or technical measure. The assessment has therefore informed the planning considerations, recognising the need to weigh potential impacts on protected persons alongside the overall planning balance.

9.43. Subject to these considerations, the Council has taken account of its duties under the Equality Act 2010. The presence of this potential impact is a material consideration to be weighed in the decision-making process.

## 10 CONCLUSIONS

10.1 The application site is located beyond the defined settlement hierarchy in an Elsewhere location and forms part of the open agricultural setting of Bunkers Hill. The proposed residential development would result in the unjustified encroachment of built development into open countryside, would fail to integrate with the established settlement pattern and would erode the rural character and visual transition into the hamlet.

10.2 The site also forms part of the open rural setting of Bunker House, a non-designated heritage asset whose significance derives in part from its historic function as an early 19th-century poorhouse/workhouse and its relationship with the surrounding agricultural landscape. The introduction of up to seven dwellings on this open land would result in harmful encroachment that would erode the asset's rural backdrop and diminish the ability to appreciate its historic context. This harm arises directly from the location and amount of development and cannot be mitigated through detailed design at Technical Details stage. As such, the proposal conflicts with Policies LP16 and LP18 of the Fenland Local Plan and with paragraph 211 of the NPPF, which requires a balanced judgement having regard to the scale of harm and the significance of the heritage asset.

11.3 The site also lies within Flood Zone 3 and the applicant has failed to demonstrate, through a robust Sequential Test based on the appropriate district-wide search area, that no reasonably available sites exist at lower risk of flooding. In addition, the proposal does not deliver the wider community sustainability benefits required to satisfy part (a) of the Exception Test.

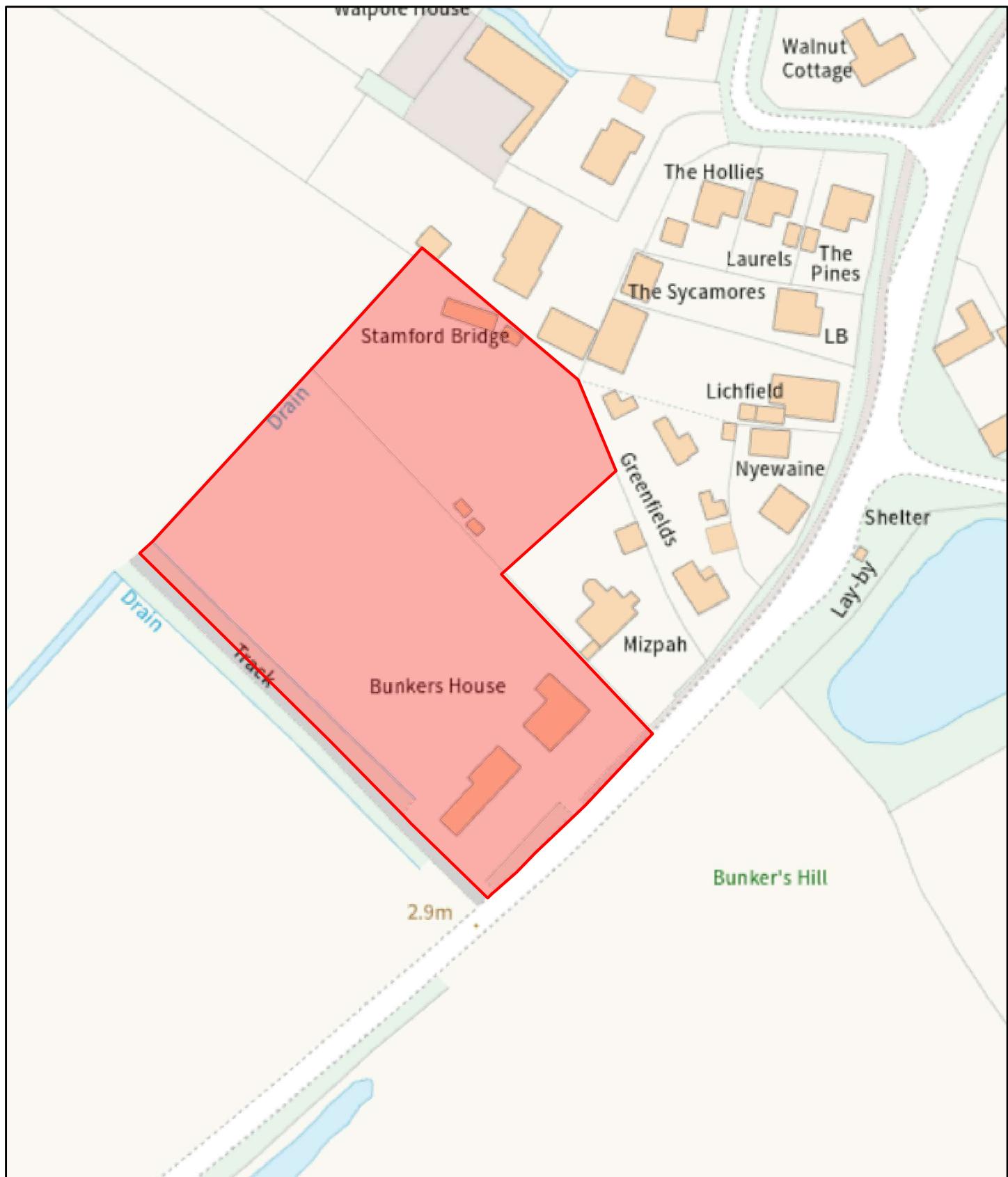
11.4 Whilst the proposed residential use would not, in principle, result in unacceptable amenity impacts and the technical flood mitigation measures proposed may be capable of making the development safe, these matters do not overcome the fundamental policy objections to the site's location and flood risk vulnerability.

11.5 Accordingly, the proposal is contrary to Policies LP3, LP14 and LP16(c) and (d) of the Fenland Local Plan, and to paragraphs 8, 11, 130, 135, 170–182, 187, and 211 of the National Planning Policy Framework. The development is therefore unacceptable in principle and should be refused.

## 11 RECOMMENDATION

**Refuse**, for the following reasons:

1.	<p>The application site is located outside the defined settlement hierarchy in an area classified as an Elsewhere location and lies beyond the established developed footprint of Bunkers Hill. The site forms part of the open agricultural setting of the hamlet and performs an important visual and rural transition function when approaching the settlement along High Road. The proposed residential development of seven dwellings would result in the unjustified encroachment of built development into the open countryside, would fail to integrate with the established settlement pattern, and would erode the rural backdrop of Bunker House, a non-designated heritage asset, thereby harming its setting and the ability to appreciate its historic function. The proposal does not relate to a use that is essential to the effective operation of a rural enterprise and is therefore unacceptable in principle for the purposes of Permission in Principle.</p> <p>The proposal is therefore contrary to Policies LP3, LP16(c) and (d) and LP14 of the Fenland Local Plan and to paragraphs 135(c), 187, and 211 of the National Planning Policy Framework.</p>
2.	<p>The site lies within Flood Zone 3 and the applicant has failed to satisfactorily demonstrate through the Sequential Test that no reasonably available sites exist at a lower risk of flooding within the appropriate district-wide search area. Furthermore, the proposal fails to deliver the wider community sustainability benefits required to satisfy the first limb of the Exception Test. As such, the site has not been demonstrated to be suitable for residential development in flood risk terms at the Permission in Principle stage.</p> <p>The proposal is therefore contrary to Policy LP14 of the Fenland Local Plan and to paragraphs 170–182 of the National Planning Policy Framework.</p>



11/11/2025, 11:50:16 AM

1:1,250  
0 15 30 55 110 60 m  
0 15 30 220 ft

 Fenland District Boundary



