



Document Reference
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East Cambridgeshire
District Council

Policy LP19 – Maintaining and improving community facilities

November 2017

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1. Introduction and Policy Context

Introduction

- 1.1 East Cambridgeshire District Council is reviewing its Local Plan, which was last adopted in April 2015. The new Local Plan, which is hoped to be adopted in 2018, will provide a framework for development in the district until 2036 and beyond.
- 1.2 This Evidence Report (which is one of a collection) provides background information and justification for policy LP19 (of the Proposed Submission Local Plan, November 2017), which relates to maintaining and improving community facilities.

National policy

- 1.3 The National Planning Policy Framework (NPPF) was published in March 2012 and the National Planning Practice Guidance (NPPG) was introduced in 2014 which offers 'live' government guidance.
- 1.4 The following NPPF Paragraphs are particularly relevant:
 - Paragraph 7 states that the planning system in achieving sustainable development should *"create a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being"*;
 - Paragraph 17, in listing 12 core planning principles, requires planning to *"take account of and support local strategies to improve health, social and cultural well-being for all, and deliver sufficient community and cultural facilities to meet local needs"*;
 - Paragraph 28 states that planning policies should support economic growth in rural areas by promoting *"the retention and development of local services and community facilities in villages, such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship"*;
 - Paragraphs 69 to 78 provide requirements for promoting healthy communities including the requirement for planning policies to *"plan positively for the provision and use of shared space, community facilities (such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments"* and *"guard against unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs"*;
 - Within the "plan-making" section there is a requirement for local planning authorities to include strategic policies to deliver *"the provision of health, security, community and cultural infrastructure and other local facilities"*.
- 1.5 The above NPPF policy and any relevant NPPG guidance has been taken into account in preparing the Local Plan as a whole, and policy LP19 in particular.

2 East Cambridgeshire Context in Relation to Policy LP19

- 2.1 East Cambridgeshire is a rural district containing many dispersed settlements including a number of small villages with limited facilities. The protection of existing, and provision of new, community facilities is essential for meeting the day-to-day needs of residents and

businesses, and for the creation of sustainable and thriving communities, and reducing the reliance on the private car.

- 2.2 Section 7 of the Local Plan sets out a summary of the known facilities present in each village at the time of writing.

3 Local Plan Policy: Preliminary Draft

- 3.1 The Preliminary Draft Local Plan (February 2016) contained a brief policy entitled 'Maintaining and improving community facilities'. A number of representations were made on the policy, and in summary the key issues raised for the policy were:

- Sports facilities should be moved out of the policy, into a separate policy
- Policy should be expanded, to set greater standards and expectations
- Policy should be strengthened to protect pubs
- Any development proposal near the border with Suffolk should include consideration as to whether or not any resulting demand for school places will result in demand being placed upon Suffolk schools
- There is no reference within the plan to the protection and provision of 'cultural' facilities. Policy LP19 could be expanded to include requirements for retention and provision of cultural, arts and museum facilities
- Comments broadly supporting all or elements of the policy.

- 3.2 In response to the comments received at the Preliminary Draft stage, together with further consideration of existing or new evidence, the policy was substantially amended for the Further Draft.

- 3.3 It was agreed that the Preliminary Draft version of the policy was overly brief, and therefore lacked clarity and effectiveness. A comprehensive re-writing of the policy was therefore undertaken, though, broadly speaking, it retained the same emphasis of resisting the loss of community facilities.

- 3.4 As can be seen in the revised policy, and to meet a representor's request, the policy also excluded sports facilities, as that was now covered by an amended and expanded policy LP21.

- 3.5 Finally, paragraph 5.6.1 was amended to read:

"...in its present form. Evidence of demand, viability and/or need will be determined on a case by case basis and may include evidence of use, viability evidence or other information as appropriate. Community facilities to which the policy applies is listed in the policy itself. However, Policy LP21 deals with open spaces, sports and recreational facilities, so these forms of facilities are not covered by LP19".

The above additional text and rewritten policy provides clarification in relation to the approach to demonstrating need, or lack of, for a facility and the extent of facilities covered by the policy, in response to the comments received seeking extra protection for specific facilities, and those seeking clarification or rewording in relation to cultural and sports facilities.

- 3.6 We did not take forward the comments relating to the Suffolk area because these cross boundary issues could be addressed as necessary within the settlement specific pages, in Section 7, and through case-by-case development management decisions.

4 Local Plan: Further Draft

- 4.1 The Further Draft was published for consultation in January – February 2017.
- 4.2 Various comments were received during the Further Draft consultation, either supporting the policy or expressing concern over certain aspects of the policy. In summary, the key issues raised for the policy were:
- Various comments broadly supporting elements of the policy;
 - Various comments suggesting improvements to clarity of policy, including reflection of the role of community facilities, that new facilities must be multi-use, meeting criteria for loss of community facilities and the provision of facilities at an early stage of development.
 - The policy is too vague and lacks detail, particularly in relation to the scale and type of facilities to be provided (with reference to Ely, specifically).
 - Concern that the policy as written would add a further cost burden on developers, which could make the development unviable. Evidence in this regard is weak.
 - Penultimate bullet should be expanded with ‘but not one that could compromise the early delivery of the open market housing’
 - The requirements of the policy in respect of funding and governance arrangements are too onerous.
- 4.3 In the existing facilities section, the first bullet has been expanded slightly to refer to ‘demonstrated by evidence’.
- 4.4 An additional bullet point has been included within the 'New Stand-alone facilities section of the policy to read “*Be multi-use and flexible, if at all possible.*” in response to comment that new facilities should be multi-use and flexible.
- 4.5 No changes have been made in response to the comment relating to the criteria for the loss of a community facility, as the policy makes clear (via the use of ‘or’ after each bullet) that all the criteria do not need to be met. The representor appears to have misread the policy.
- 4.6 The suggested changes to the wording of the penultimate bullet point have not been included, as it is important that community uses come on stream as the residents start to move into an area. Community facilities which arrive late often mean that early residents lack facilities, sometimes for years, and use of such facilities can subsequently be less, because residents have adapted their lifestyles prior to their provision. Provision of facilities at the very end can also risk non-delivery.
- 4.7 No changes have been made to specifically add detail relating to the type and scale of new facilities to be provided by development, as Section 7 of the Local Plan sets out by settlement the infrastructure/facility requirements that have been identified. In addition, the site allocation policies also identify if specific facilities have been identified as being required.

5 Alternative Reasonable Options

- 5.1 The following alternative options have been considered for this policy. (Option 1 is the preferred policy approach which has been included in the Proposed Submission.)

- 5.2 **Option 2:** To not have a policy and rely on national policy for this subject area. This option has been rejected as it would not provide a robust enough policy to ensure that loss of facilities is resisted, while making provision for new facilities.
- 5.3 **Option 3:** A policy to preserve facilities, at all cost, if they are the last in the settlement. This option was rejected as it was considered to pose a risk of unviable facilities closing and leaving empty buildings that cannot be redeveloped.
- 5.4 **Option 4:** A policy to preserve all facilities. As with Option 3, this option was rejected because as it was considered to pose a risk of unviable facilities closing and leaving empty buildings that cannot be redeveloped.

6 Conclusion

- 6.1 This Evidence Report demonstrates the rationale for the policy as contained in the Proposed Submission Draft Local Plan (November 2017). It is hoped this helps demonstrate how we have responded to comments received during the consultation stages, as well as how the latest evidence and national guidance has been taken into account.