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East Cambridgeshire
District Council

Policy LP3 – The Settlement Hierarchy and the Countryside

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 LP3 (of the Proposed Submission Draft Local Plan, November 2017), which relates to the settlement hierarchy and the countryside.

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 One of the Core Planning Principles identified in paragraph 17 of the NPPF is that planning should:
"actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable"
- 1.5 Section 3 of the NPPF concerns "Supporting a prosperous rural economy". The following points are particularly relevant:

Paragraph 28 –

"Planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development. To promote a strong rural economy, local and neighbourhood plans should:

- *support the sustainable growth and expansion of all types of business and enterprise in rural areas, both through conversion of existing buildings and well designed new buildings;*
- *promote the development and diversification of agricultural and other land-based rural businesses;*
- *support sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors, and which respect the character of the countryside. This should include supporting the provision and expansion of tourist and visitor facilities in appropriate locations where identified needs are not met by existing facilities in rural service centres; and*
- *promote 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."*

This clearly shows how the Local Plan must ensure that it takes proper account of the opportunities for developing the rural economy, providing flexibility for local needs.

- 1.6 Section 4 of the NPPF concerns "*Promoting sustainable transport*". The following points are particularly relevant:

Paragraph 30 –

“Encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion. In preparing Local Plans, local planning authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport.”

This demonstrates a clear justification for the settlement hierarchy approach, taking account of sustainable modes of transport and reducing the distance needed to travel to services and employment for example.

- 1.7 Paragraph 55 of the NPPF concerns the promotion of sustainable development in rural areas. It states that:

“To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities ... Local planning authorities should avoid new isolated homes in the countryside unless there are special circumstances...”

- 1.8 The NPPG contains guidance on how local authorities can support sustainable rural communities [Reference ID: 50-001-20140306]. This states that:

“It is important to recognise the particular issues facing rural areas in terms of housing supply and affordability, and the role of housing in supporting the broader sustainability of villages and smaller settlements...”

“Assessing housing need and allocating sites should be considered at a strategic level and through the Local Plan and/or neighbourhood plan process. However, all settlements can play a role in delivering sustainable development in rural areas – and so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence.”

- 1.9 This suggests that a policy should not unduly restrict housing development in rural settlements with a blanket restriction, but directing development to certain settlements at a strategic level whilst providing flexibility to allow appropriate growth where needed, is appropriate. This is where community-led development can play an important part in delivering growth where it is needed and supported by the local communities particularly in the rural areas.

2 East Cambridgeshire Context in Relation to Policy LP3

- 2.1 East Cambridgeshire has 35 parishes and about 50 villages. There are three main settlements; Ely, Soham and Littleport and these comprise around 45% of the population and the remaining population is scattered amongst the settlements. The villages are, in the policy, divided into three categories; large, medium and small villages, and this is based on the population and facilities contained in the village.
- 2.2 Ely is the largest urban area and acts as a retail, service and administrative centre for a wide rural catchment. Soham is a small market town with a range of shops, catering for day-to-day needs. Littleport is a small fenland town with a very localised service catchment due to its proximity to Ely. Other settlements, which are all villages, are a range of sizes, and some play a key service role for their rural hinterlands.
- 2.3 A detailed evidence report on the creation of a settlement hierarchy (Settlement Hierarchy in East Cambridgeshire – February 2016) was published with the Preliminary Draft Local Plan, and was updated and republished for the Further Draft Local Plan (Settlement Hierarchy in East Cambridgeshire – January 2017). A final update of that report has now been prepared and published (Settlement Hierarchy in East Cambridgeshire – November

2017). That Settlement Hierarchy Report should be read in conjunction with this evidence report.

3 Preliminary Draft Local Plan

3.1 The **Preliminary Draft Local Plan (February 2016)** contained a policy entitled “Settlement Hierarchy and the Countryside”. A number of representations were made on the policy, and in summary the key issues raised for the policy were:

- Support (mostly from developers/agents) for the following villages in the settlement hierarchy; Bottisham, Burwell, Dullingham, Ely, Fordham, Haddenham, Isleham, Kennett, Littleport, Little Thetford, Lode, Soham, Sutton, Witchford, Wicken (note: Developers supporting the position in the hierarchy of a particular village usually are promoting sites within that village).
- Ashley Parish Council and others object to **Ashley** as a “medium village” as there is no primary school or doctor’s surgery and employment opportunities are extremely limited.
- Dullingham Parish Council would like **Dullingham** village to be downsized in the settlement hierarchy to a small village category rather than medium village due to lack of facilities.
- Witchford Parish Council objects to **Witchford** being placed in “large village” category as it does not have the range of facilities required for a large village and is concerned public transport will not be able to cope with increased development.
- Settlement hierarchy could lead to loss of green spaces and biodiversity as it will encourage more development in the villages.
- **Ely** should be separated out at the top of the hierarchy, then Larger Villages (including Littleport and Soham) split in two categories.
- **Burwell** should be moved up to ‘main settlements’ with the cut off point being reduced from 7,000 to 5,000 dwellings for a settlement being a ‘main settlement’.
- Very little comments received on the wording of the policy itself (other than the categorisation of settlements, as discussed in the above points)

3.2 After careful consideration, the Council did not, in the Further Draft Local Plan, take forward the suggestion to re-categorise villages of Ashley, Burwell, Dullingham, Ely and Witchford. The reasons are discussed below.

3.3 **Ashley’s** population exceeded the minimum threshold for a medium village which is set at 500. Whilst a medium sized village is expected to have a certain level of facilities, a lack of one facility or another would not preclude a village from this category. Although Ashley village does not have a primary school, there is Cheveley C of E Primary School in close proximity. It is likely most medium villages will not have doctors’ surgery so not having this facility in the village is not a critical factor. Ashley does have some, albeit limited, facilities, but sufficient for it to be included in the medium category. On balance, **Ashley village remained a medium village in the settlement hierarchy.**

3.4 Dullingham Parish Council requested that **Dullingham** be classified as a small village rather than medium village. The reasons given were that the village lacks facilities and the population within the village is a lot less than that recorded. Whilst it is accepted that development in and around Dullingham is not of a tightly knit nature (unlike, for example, the ‘isle’ settlements in the northern half of the district), the general population and facilities in and around the Dullingham area (including Kettlefields primary school) appropriately places Dullingham in the medium village category. **Therefore Dullingham remained in the medium village category.**

- 3.5 **Witchford** village has, on balance, the facilities and the population to qualify as a large village. Whilst it may not have the full range of shops (compared with other villages) it has a primary school and college, as well as a large Enterprise Zone located just outside Witchford, within easy travel distance (foot or cycle), something which the other large villages do not have, and which is not fully reflected in the settlement hierarchy scoring as perhaps it could be. Therefore, **Witchford village remained as a large village in the settlement hierarchy.**
- 3.6 **Burwell** is acknowledged as being of a population size above other Large Villages. However, it is quite clear that Burwell does not fall into a category within which Soham and Littleport fall – there are clear difference in scale of settlement, and range of facilities provided. On balance, Burwell appears far more closely related, in terms of services and facilities, to the other settlements listed as a 'large village', and therefore, **Burwell village remained as a large village in the settlement hierarchy.** The proposal to reduce the threshold for where such settlements fall in the hierarchy appears purely a mathematical suggestion to force Burwell up to a 'main settlement' and is not based on any evidence. This suggestion was therefore rejected.
- 3.7 **Ely** is rejected as being in need of a classification of its own, because it is not sufficiently bigger, in size or facilities, than Littleport or Soham. To create a further layer in the hierarchy, Ely would have to be something of the scale of a large town (say, 50,000 population or more, and/or have an economic base with high levels of net in-commuting).
- 3.8 In terms of the wider policy wording, the policy was updated in the Further Draft to reflect the fact that the Further Draft was now proposing site allocations. In addition, an extra bullet point was added at the end of the Policy, which cross refers to the new Infill policy (Policy LP32) as proposed to be introduced to the Local Plan.

4 Further Draft Local Plan

- 4.1 The **Further Draft Local Plan (February 2016)** therefore contained a policy entitled "Settlement Hierarchy and the Countryside". A number of representations were made on the policy, and in summary the key issues raised for the policy were:
- Considerable support for this policy from developers who are promoting sites in the villages including Dullingham, Lode, Fordham, Ely, Wicken, Witchford, Isleham, Sutton, Littleport.
 - Support for Bottisham as a large village but more housing growth should be allocated to reflect this status.
 - The Settlement Hierarchy should also consider the impact of viability and market conditions, which will result in sites in the right locations coming forward.
 - Considerable objection to major development at Kennett – development not in accordance with settlement hierarchy, medium village lacks infrastructure and facilities. 193 standard letter objections to KEN.M1 site.
 - Kennett is classified as medium village due to having a primary school. Only 25% of the children are from Kennett and the growth proposed for the village (4x current housing stock) is disproportional and unreasonable.
 - To improve deliverability, smaller sites should be allocated and distributed through the hierarchy.
 - LP3 should provide greater flexibility for development in the countryside and there should not be a blanket ban. NPPF encourage sustainable housing development in rural areas and this could help to retain or promote community facilities.

- Village boundaries unnecessarily restrict development in rural areas and this is contrary to NPPF. Development in sustainable locations should go ahead without delay.

4.2 In addition to the above comments, the following requests were put forward for changes to the settlement hierarchy either as a response to policy LP3 or in response the village chapter in section 7 – Policies for Place. All requests for such changes are discussed in this evidence report, as it more relates to policy LP3 than to village chapters. The following suggestions were made:

- **Ashley** does not have a primary school and there is limited public transport service and so categorisation of Ashley as a medium village is questioned.
- **Burwell** should be considered as a main settlement rather than a large village due to large range of facilities and services located in the village.
- **Dullingham** should be classified as a small village as population of village is smaller than parish population which is used to categorise the village in the settlement hierarchy.
- **Isleham** does not meet the criteria of a large village as it has limited shops and no doctor's surgery.
- Considerable objection to major development at **Kennett** as the development is not in accordance with settlement hierarchy, medium village lacks infrastructure and facilities to cater for this growth.
- Object to **Wentworth** designated as a small village. Wentworth should be medium village due to its good connection to local infrastructure and should be allocated additional growth.
- **Wicken** should be classified as a small village as there is no primary school and population of Upware is included in Wicken parish which should not be. Wicken Fen facilities are included which does not contribute to the village.
- **Witchford** is large village as in population but lacks the facilities.

4.3 After careful consideration, the Council has, for the Proposed Submission Local Plan, undertaken the following actions:

4.4 **Ashley, Burwell, Dullingham and Witchford:** No change, for the same reasoning as per that set out earlier (when similar suggestions were made at the Preliminary Draft stage), though for Dullingham it is accepted that the revised population data suggests the village now falls under the population threshold for a medium village. Nevertheless, the range of facilities means it appropriately remains as a medium village.

4.5 As can be found in the Settlement Hierarchy Report, Isleham fits comfortably within the 'large village' category for both population and facilities. Not having a doctor's surgery or only having limited shops in the village is not critical factor as level of facilities varies between the villages in the large village category. **Isleham therefore is proposed to remain in the large village category.**

4.6 Although there was some support for development at **Kennett**, by far the majority objected to the proposed allocation of mixed-use site (KEN.M1), with many making reference to their view that Kennett was a 'small' village. Other evidence reports discuss the merits of that specific site, but in terms of the settlement hierarchy, Kennett has a reasonable level of facilities, much greater than would be the case for a typical 'small' village. And, it is on that basis (rather than the population of the village) which dictates that **Kennett should remain a 'medium' village in the hierarchy.**

4.7 It is suggested that **Wentworth** should be a medium village due to its good connection to local infrastructure rather than being in the small village category. Both in terms of population and facilities Wentworth is well short of the requirements of the medium village.

Although the village could have access to some limited facilities these are in the neighbouring villages and not in the village itself, and are not easily and sustainably accessible. Most of these nearby facilities would be accessed by private transport. Therefore, there are no grounds to consider moving Wentworth up to a medium village, and **Wentworth should remain a small village.**

- 4.8 It was suggested that **Wicken** village should be classified as a small village rather than medium village. In terms of facilities alone, Wicken would be categorised as a small village. However, its population (even when excluding Upware village population) would still categorise it as a medium village. Following comments made by representors and a re-evaluation of the evidence (including, crucially, no primary school and virtually non-existent public transport), it has been decided that the village is more appropriately categorised as a small village rather than medium. **Wicken should (and has) therefore moved to the small village level, rather than medium village,** in the settlement hierarchy.
- 4.9 In terms of policy wording, some additional changes have been made, as follows:
- 4.10 First, 'Lode and Long Meadow' has been amended to '**Lode with Long Meadow**', to more accurately reflect the terminology used for these closely linked communities.
- 4.11 Second, '**Woodditton and Saxon Street**' have been split into two separate villages (they were previously joined in the 2015 Local Plan, reflecting the fact that they are in the same parish), and both villages have dropped down a tier to 'small villages', for reasons set out in the settlement hierarchy evidence report.
- 4.12 Third, '**Kirtling and Upend**' has also been split into two separate villages, both remaining in the small village category.
- 4.13 Fourth, to aid clarity, in the final paragraph of the policy a sentence has been added to clarify what development is appropriate **within development envelopes**. Previously, the paragraph only referred to development outside development envelopes.
- 4.14 Fifth, the **supporting text to the policy has been updated** and unnecessary detailed explanatory text has been removed. Such text removed does not alter the intent or implementation of the policy, but helps ensure a succinct and clear Local Plan.
- 4.15 The suggestion that viability should be considered as part of the settlement hierarchy process has been rejected. That is not a relevant consideration to determine where in a hierarchy a settlement sits.
- 4.16 The suggestions regarding development envelopes/ restrictions in the countryside are rejected. Development envelopes are long-standing planning policy practice, and ensure development is directed to the right locations. National policy also has long standing policy to protect the countryside, for its own sake as well as on sustainability grounds.

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 Further Draft.)

Option 2:- No policy, rely on national policy. This option has been rejected. There is general support for the principle of a settlement hierarchy, and such a policy gives a clear local specific steer on where, in principle, development is to be directed, and how applications in the countryside will be considered.

Option 3: - A more flexible policy, with no development envelopes. This option has been rejected due to the uncertainties that may arise and the potential for excessive development coming forward in inappropriate settlements, potentially with a detrimental outcome on undeveloped land, climate change and the economy. There is clear, local support for the continuation of Development Envelopes, and no evidence to suggest that their ongoing inclusion is inappropriate.

Option 4: - Settlements in alternative levels of the hierarchy. This is rejected for reasons set out in the Settlement Hierarchy evidence report and in this Evidence Report.

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.