



Document Reference
PS.EVR.LTD

East Cambridgeshire
District Council

Policies for Little Downham

November 2017

Contents

1.	Introduction and Policy Context.....	1
2	Little Downham in context	2
3	Local Plan Policy: Further Draft.....	2
4	Response to Comments received	4
5	Alternative Reasonable Options	5
6	Conclusion	5

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 relating to draft policies relating specifically to the village of Little Downham, including:
 - Little Downham1: Little Downham’s Local Character and Facilities;
 - Little Downham2: Infrastructure and Community Facilities; and
 - Little Downham3: Allocation Sites.
- 1.3 The purpose of this report is to provide justification for the inclusion of specific policies relating to an individual settlement, and should be read alongside other Local Plan evidence documents. For example, a detailed reasoning of the settlement’s position in the Settlement Hierarchy is contained in the Settlement Hierarchy Report. For the findings of the assessment of individual sites, please refer to the Site Assessment Evidence Report.
- 1.4 Collectively, the policies attempt to provide a coherent strategy for the settlement, over the plan period, which meets the area’s needs and reflects the views of the community.

National policy

- 1.5 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.
- 1.6 Through its Core Planning Principles, the NPPF indicates that planning should:

“...take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it...”
- 1.7 The emerging Local Plan recognises the differing roles and characters of different areas through providing a suite of bespoke policies, specific to each settlement in the district. These policies are set out in individual settlement chapters, in Section 7: Policies for Places.
- 1.8 In paragraph 157, the NPPF sets out a series of requirements which Local Plans should fulfil. The following requirements are considered relevant to the settlement chapters contained within Section 7:

“...Crucially, Local Plans should:

...be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area...

...not simply be about scrutiny, but instead be a creative exercise in finding ways to enhance and improve the places in which people live their lives...

...plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework...

...be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date...

...allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate...”

- 1.9 In response to these requirements, Section 7 proposes the inclusion of draft policies relating to each settlement’s local character, infrastructure and facilities. Draft site allocations for a range of land uses are proposed for many settlements.

2 Little Downham in context

- 2.1 Little Downham is located 2 miles north-west of Ely. Due to its population and good range of services, the Settlement Hierarchy identifies Little Downham as a ‘Large Village’.
- 2.2 As a Large Village, it is considered that Little Downham offers the potential to accommodate growth, thereby contributing to meeting the development needs of the area. The overall scale of growth is influenced by the village’s position in the Settlement Hierarchy, the availability of suitable sites, and the presence of environmental and/or infrastructure constraints.

3 Local Plan Policy: Further Draft

- 3.1 A Call for Sites exercise was held as part of the Preliminary Draft Local Plan consultation, during which a number of site submissions were received for Little Downham. The site submissions were assessed and sites considered suitable for development were proposed for allocation.
- 3.2 The Little Downham chapter of the Further Draft Local Plan proposed three draft policies:
- 3.3 Policy *Little Downham1: Little Downham’s Local Character and Facilities* seeks to ensure development proposals maintain Little Downham’s built character, and maintains the village’s facilities expanding on them where possible.
- 3.4 Policy *Little Downham2: Infrastructure and Community Facilities* sets out the settlement’s priorities in terms of infrastructure and facilities.

- 3.5 The content of the policies was informed by the Local Plan 2015, engagement with the Parish Council (in 2016), and responses to the Preliminary Draft Local Plan consultation (where applicable).
- 3.6 Policy *Little Downham3: Preferred Allocation Sites* identifies one site allocation, LTD.H1 *Land west of Ely Road*. The 1.2ha site is currently allocated in the adopted Local Plan 2015. Following re-assessment, the site was considered to be suitable for development. The draft site allocation is expected to provide approximately 25 units.
- 3.7 A number of other site submissions were assessed, but each was found to be not suitable for allocation. The results of the site assessment are presented in the Site Assessment Evidence Report 2017.
- 3.8 Little Downham has a Development Envelope to define the boundary of the built up area and extent of the countryside. A number of changes to Little Downham's Development Envelope were proposed during the Preliminary Draft Local Plan consultation. Following assessment, each was rejected. However, an amendment was made to the Development Envelope in response to a submission received during the Further Draft Local Plan consultation. The reasons for selection/rejection are set out in the Development Envelopes Assessment Report November 2017.
- 3.9 In summary, the following comments were received during the Further Draft Local Plan consultation (January – February 2017) in response to Little Downham draft policies:

Infrastructure and Other constraints

- Policy Little Downham1 makes reference to development contributing to the maintenance of community facilities. As development will be subject to CIL, this policy requirement is not compliant with CIL r122. Requirement should be removed.
- Policy Little Downham2 identifies a number of infrastructure priorities. Developer contributions over and above CIL should be fairly and reasonably related to the development and cannot be sought to address an identified shortfall or deficiency in provision. This requirement is not compliant with national policy and should be removed.
- Cambs County Council indicates that it may be necessary to mitigate impact of development with a small scale expansion of primary school.

Site Specific Comments

LTD.H1 Land west of Ely Road

- Concerns raised regarding location of access. Access to Canon Street would cause unacceptable traffic congestion at busy times and be a safety concern for pedestrians.
- Access should be onto Ely Road, preferably via a mini-roundabout.
- Site is adjacent to the conservation area. Development of the site will need to conserve, and where opportunities arise, enhance the conservation area and its setting. This requirement should be included within the policy and supporting text.
- There is a quintessential view of Ely Cathedral to the south of the site. The impact of development on this view should be considered, and the Council should demonstrate that any impacts on the historic environment would be acceptable.
- Surface water receiving system has no residual capacity. Appropriate surface water accommodation should be provided prior to development.

- Site promoter welcomes the proposed allocation. However, suggests indicative dwelling figure should increase from 25 to 35 dwellings, to make efficient use of land.
- Policy requirements are too prescriptive and should be removed.
- It is unnecessary to specify in the policy minimum open space requirement as this will be calculated on no. and size of dwellings proposed.
- Need to minimise visual impact on Ely Road is accounted for by other policies in the plan and will be addressed at the planning application stage.
- Site remains deliverable and available. Expressions of interest received from developers are currently being explored.
- Site area should be increased to include land to the south east – see Site/16/02.

Site/16/02 Land off Ely Road (rejected site)

- Site promoter objects to rejection of site.
- Site promoter supports LTD.H1, and suggests draft allocation is extended to include Site/16/02.
- Development of site would increase the supply of housing, and improve the visual character and amenity of the area through removal of existing agricultural buildings and associated heavy vehicle movements.
- Site is currently in agricultural use; therefore development of site would not result in the loss of employment.
- Site could provide vehicular access to Ely Road.
- Site supported by Parish Council.

New Site(s) suggested

- Suggested development envelope change at Tower Mill

4 Response to Comments received

- 4.1 Cambridgeshire County Council indicates that a small-scale expansion of the primary school (Downham Feoffees) may be required to mitigate the impacts of development. In the Proposed Submission Local Plan, policy Little Downham 2 has been amended to include the following policy requirement:
- a. Ensure sufficient primary school places are made available over the plan period.
- 4.2 A range of comments were received relating to the suitability of site LTD.H1, which is identified as a site allocation by policy Little Downham3. Such issues are addressed by the Site Assessment Evidence Report November 2017.
- 4.3 It was raised that the site is located adjacent to the Little Downham Conservation Area, and that a quintessential view of Ely Cathedral exists to the south of the site. To address matters raised during consultation, policy Little Downham3 was amended to include the following policy requirements:
- Have regard to the site's relationship to the Little Downham Conservation Area and important views of Ely Cathedral; and
 - Seek to retain distinctive landscape features, for example the hedgerow

at Cannon Street and trees at Ely Road.

- 4.4 The site promoter challenged the requirement to provide 0.16ha of public open space as part of site LTD.H1. This requirement has been carried forward from the Local Plan 2015 as it was assumed (in good faith) that the landowner/site promoter was in agreement. Since the site promoter has challenged the requirement, the policy requirement is removed and provision of open space will be determined at the planning application stage in accordance with policy LP21.
- 4.5 A change to the Development Envelope was proposed to include a developed plot at land at Tower Mill. Please refer to the Development Envelope Assessment Report.

5 Alternative Reasonable Options

- 5.1 Option 1 is the preferred policy approach for Little Downham, comprising three policies as set out.
- 5.2 Option2 would be to not include either policies Little Downham1 or 2, but these are rejected on the basis that they both give locally specific policy matters for the settlement, which would be lacking without such a policy.
- 5.3 Option 3 would be to include alternative site allocations. Such alternatives are assessed in both the Sustainability Appraisal report and the Site Assessment Evidence Report.

6 Conclusion

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