

Hearing Statement - Matter 2 - Policy CS3 – Settlement Hierachy

Question 5

1. No objection is made to the principle of identification of broad locations for growth

Question 6

2. It is considered that both the number of Growth Villages and the specification of the scale of growth envisaged within all villages is not sufficient to fulfil the wishes and needs of the population, as demonstrated by the update to the Housing Evidence Report Sept 2013 (CD025), which shows a reduction (p32) from around 150 dwellings per annum currently in the rural areas, to only 30 for most of the plan period, and there is concern that with the significant increase in proposed windfall development following changes at March, there is the risk of unplanned expansion of certain villages on the back of perceived local support rather than concentration on an enlarged number of the larger villages with better scope and facilities to accommodate the growth, and better located for communications with the Market Towns (by adding Leverington and Elm)

Question 7

3. CS3 gives no specific guidance upon numbers, either for each village or for each specific proposal. Para 154 of NPPF states that it should be clear what will and what will not be permitted. The total of 1200 for other settlements, but with larger scale growth directed towards the Growth Villages is at odds with the Village Threshold Evidence Report Feb 2013 (CD033) which talks about 10% increase in stock being reasonable. On this basis Leverington and Elm as two of the largest villages have similar scope as the Growth Villages, whereas the policy currently indicates a lesser scale appropriate for Limited Growth settlements. As such it is submitted that the plan is not sound in the guidance it gives in that it is not positively prepared – there is no apparent clear strategy for scale of growth; it is not justified – if the intention is that villages should be permitted to grow by 10% then those larger settlements should be designated as growth settlements; it is not effective – it is not clear on the strategy it proposes
4. Already, given the policy is already being utilised for development control purposes, we are seeing significant proposals in both growth and limited growth settlements, with applicants and officers alike have no clear idea of whether they meet or do not meet policy, and it is being left to members almost on an ad hoc basis to determine whether they support or resist the proposals.
5. It is suggested that the additional settlements of Leverington and Elm should be designated as Growth settlements, 10% guidance should be adopted as a limit for Limited Growth settlements and Small Villages, the scale for Growth Villages increased to 15% of current dwelling numbers. It is submitted that this will increase the villages capacity overall to around the 1200 the policy proposes overall, and there will be then clear guidance as to a scale appropriate overall for each village.

Question 8

6. I support the inclusion of Wisbech St Mary as a growth village. With a target of 1203 in other settlements and the 10% guidance level within the Village Threshold Evidence document (CD025) indicating likely capacity of around 900 on this basis, for the target to be achieved additional capacity need to be found and the larger settlements are the appropriate locations. Whilst noting it does not have a doctors surgery, which is one of the specified requirements, Wisbech St Mary does have the range of other services needed on a daily basis and the proximity to Wisbech to utilise its facilities and its employment opportunities without the need for long travel distances.
7. However on the same basis it is submitted that Leverington and Elm are also larger size settlements with similar facilities and locations, both on the Wisbech fringe and well placed to assimilate a larger scale of growth (see Appendix A). Whilst not having surgeries, they are both within 2 miles of those facilities in town, and bearing in mind that surgeries are not facilities used daily by the public (or even open daily for appointments in the case of Wimblington), Leverington and Elm should not be excluded on that basis.
8. It is thus submitted that Leverington and Elm should be added as Growth settlements – their exclusion makes the plan unsound as it is not positively prepared or justified by objective assessment of the facilities and size of the settlements, nor effective in achieving the proposed level of growth in a sustainable manner, without overloading the facilities and infrastructure of those settlements currently selected, especially in the light of the caveat on foul drainage at Doddington and Wimblington.
9. The points in 3-5 above address the scale for these growth settlements.

Question 9

10. There is inconsistency between CS3 and CS 12 and the policy is unsound by not being effective in this respect
11. CS3 is silent in respect of criteria for determining appropriate development in Growth, and Small villages, but refers to CS12 for Limited Growth villages and elsewhere. CS 12 implies it relates to all villages.
12. It is submitted that the wording of CS3 should be amended to make clear that CS12 applies to all development in villages, which it is clear from CS12 is the intention
13. It is also submitted that there are further inconsistencies between CS3 and CS12 in relation to the development in small and other villages, where CS3 refers to infilling whereas the criteria of CS12 refer to “in or adjacent to”. It is submitted that this inconsistency makes the plan unsound because of the lack of clarity, and could be resolved by amendment of the wording of CS3 to refer for all villages to the criteria of CS12 rather than using alternative wording describing the location of development.

Questions 10

14. No objection previously made on this issue, but I agree the commentary does not reflect NPPF.

Question 11

15. This question reinforces the points made under 8 above. Whilst not suggesting either Doddington or Wimblington should not be Growth settlements it is illustrative of the need for a balance to be struck in terms of their selection that for the reasons stated above, appears not to exist at present.

Question 12

16. No previous objection has been submitted on this point. The Core Strategy delegates all requirements for tenure, size, type and mix to an up to date Strategic Housing Market Assessment which appears to be a report on the past rather than a Strategy for the future.

APPENDIX: SERVICES AND FACILITIES IN FENLAND VILLAGES

Settlement	Population	Post Office Facility	Convenience Shop	Other Shop	Takeaway/ Restaurant	Public House/ Social Club	Mobile Library	Place of Worship	Village/ Church Hall	Doctors	Primary School	Employment	Access to Secondary School	Bus Frequency	Railway Station
1 Benwick	1,070	0	0	0	0	1	Y	0	1	0	1	Y	0	2	
2 Christchurch	630	0*	1	0	0	1	Y	1	1	0	1	Y	0	1	
3 Church End	160	0	0	1	0	1	Y	1	0	1**	0		0	2	
4 Coates	1,180	1	1	1	1	2	Y	2	1	0	1	Y	1	3	
5 Coldham	180	0	0	0	0	0	Y	0	0	0	0	YY	1	3	
6 Collett's Bridge	110	0	0	1	0	0	Y	0	0	0	0	YY	1	0	
7 Doddington	2,210	1	3	5	1	2	Y	2	3	1	1	YY	1	3	
8 Eastrea	830	0	0	0	0	1	Y	0	0	0	0	Y	1	3	
9 Elm	1,750	1	1	1	0	2	Y	1	1	0	1	YY	1	3	
10 Fitton End	70	0	0	0	0	0		0	0	0	0		1	2	
11 Foul Anchor	80	0	0	0	0	0		0	0	0	0		0	0	
12 Four Gotes	80	0	0	0	0	0		0	0	0	0		0	0	
13 Friday Bridge	1,450	1	1	0	1	1	Y	1	1	0	1	Y	1	3	
14 Gorefield	890	1	1	1	0	1	Y	2	1	0	1	Y	1	2	
15 Guyhirn	740	0	1	0	0	1	Y	1	1	0	1	Y	0	5	
16 Leverington	1,940	1	1	0	1	3	Y	1	1	0	1	Y	1	2	
17 Manea	2,070	1	1	3	4	2	Y	2	2	1	1	Y	0	2	Y
18 Murrow	950	0	1	0	0	1	Y	1	1	0	1	Y	0	0	
19 Newton	480	1	1	0	0	1	Y	1	1	0	0		0	2	
20 Parson Drove	1,040	1	1	2	0	2	Y	2	1	1**	1	Y	0	1	
21 Pondersbridge	120	0	0	0	0	0	Y	1	0	0	0	Y	1	2	
22 Ring's End	90	0	0	0	1	0	Y	1	0	0	0		0	3	
23 Stonea	80	0	0	0	0	1		0	0	0	0		0	0	
24 Tholomas Drove	110	0	0	0	0	1		0	0	0	0		0	3	
25 Thorney Toll	80	0	2	0	2	0		0	1	0	0	Y	0	5	
26 Turves	370	0	0	0	0	1	Y	0	0	0	0		1	0	
27 Tydd Gate	80	1	1	0	0	1		1	0	0	0	Y	0	2	
28 Tydd St. Giles	780	0*	0	1	0	1	Y	2	1	0	1	Y	0	2	
29 Westry	170	0	0	0	0	0		1	1	0	0	YY	1	3	
30 Wimbington	1,880	1	2	2	0	2	Y	2	1	1	1	YY	1	2	
31 Wisbech St. Mary	1,590	1	2	0	1	2	Y	2	1	0	1	YY	1	3	

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APPENDIX A