

Helpston Parish Council

c/o 36 West Street,
Helpston
Peterborough
PE6 7DX
18th September 2017

For the attention of Gemma Wildman
Principal Planner,
Peterborough City Council

Dear Gemma,

Given below are the comments from Helpston Parish Council on the Proposed Peterborough Local Plan due for review by the Planning and Environmental Protection Committee on Tuesday 19th September 2017....

Objections to LP41.5 (HEL008H) as a new site in the Proposed Peterborough Local Plan

References are made in this document, to paragraphs in National Planning Policy Framework / Advice, statements in the Draft Local Plan and statistics gathered by Cambridge Research Group.

Policy LP2 The Settlement Hierarchy and the Countryside..... Village Categories

In 2010 Helpston was designated as a **“Limited Growth Village”** and at that time three sites SA6.6, SA6.1 and SA6.12 were designated for development. In the Peterborough Settlement Hierarchy Study, Helpston is now designated as a **“Medium Village.”** In the Proposed Draft version of the Local Plan and based on the requirements of national policy and guidance, a **medium village** will, as stated in the Peterborough Settlement Hierarchy Study.....

“Meet some of the criteria of a Large Village but will be likely to have a smaller population. The critical determinant will be the presence of a primary school. These villages could accommodate some small-scale growth which is appropriate in scale and nature; by allowing limited growth, this could help support the viability of some of the existing facilities.”

In the new Proposed Submission version of the Local Plan you have cleverly omitted this somewhat limiting description, removing the definitions of Village types altogether, and substituted for it, at paragraph 5.4, the broader description....

“LP2 has been used to determine overall distribution of growth and for identifying which villages subject to consideration of constraint, would be more suitable for future growth.”

Helpston Parish Council submitted its initial objections to the site HEL006H (now in the Proposed Local Plan combined with part of HEL001H and called **HEL008H**) based on the original definition of a Medium Village as contained in the Draft Plan. Clearly our comments were noted and responsible for your removal / modification of definitions.

Nevertheless, whatever the Proposed Local Plan’s usage of definitions is, the facts remain.....

Medium Villages were previously categorised as “**Limited Growth Villages**” in the 2010 Settlement Hierarchy Study and the adopted Core Strategy (2011). Having previously changed from **Limited Rural Growth Villages** to **Limited Growth Villages** this latest categorization represents a huge change in an arbitrary and subjective description of these villages and leads to a presumption of major expansion possibilities that are completely unwarranted by the actual current village capabilities and facilities.

The emphasis here should, of course, be on **small scale** growth as stated in the Settlement Hierarchy Study. Over the period of the Local Plan the population forecast for the Barnack Ward is an increase of 7% and the dwelling stock forecast is an increase of 100 houses. These figures are obtained from the Cambridge Research Group. These forecast figures suggest that a limited growth will be experienced within the Ward that could easily be provided by infill sites and **small scale** developments across the Ward. Additionally, by promoting limited growth across a wider geographical area the impact of development is minimized, can be more easily assimilated into the existing social context and lessen the impact on facilities and services that would be experienced if such sites as HEL008H were allowed to be developed.

At paragraph 5.8 in the Proposed Local Plan:-

“It is emphasized that the position of any village in the hierarchy is largely a reflection of its size, and the scale and range of its services and facilities. Whilst this offers a pointer to its suitability (or not) for further development, it does not follow that new development is either appropriate or necessary. For example, if there is no need to identify sites for development in the rural area, then a village which is highly placed in the hierarchy may not need to have any site allocations. A village may be highly placed in the hierarchy but subject to constraints which restrict its scope for further development. Such constraints would not alter its position in the hierarchy, but would be a critical factor in determining its suitability for any growth.”

Site reference LP41.5 (HEL008H) has been identified for 82 houses.

With reference to paragraph 5.8 above and quoting from it, Helpston Parish Council contends that...

New development is **neither appropriate nor necessary**;

Helpston does not **need** any site allocations;

It is **constrained** as further development at HEL008H is into Open Countryside;

That its small Village School is currently oversubscribed and that a further 82 houses will overwhelm it and its capabilities;

That Helpston, despite its new categorisation as a Medium Village has actually seen a *reduction* in its amenities...it still only has one shop, still only one school (but now oversubscribed and turning away potential village pupils), only one public house (reduced from two) and no business employment (used to have the Paper Mills)

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Village Allocations

Paragraph 3 of the Peterborough Settlement Hierarchy Study states:-

“3.1 The National Planning Policy Framework (NPPF) and the National Planning Practice Guidance (NPPG) include the following policies and information that are relevant when determining a settlement hierarchy.

3.2

One of the NPPF Core Principles 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’

3.3 The NPPF also states

To promote sustainable development in rural area, housing should be located where it will enhance or maintain the vitality of rural communities. For example, where there are groups of smaller settlements, development in one village may support services in a village nearby. Local Planning should avoid new isolated homes in the countryside unless there are special circumstances.”

No evidence has been produced to suggest how this advice has been used in determining that this preferred site will in fact deliver any enhancement or maintain the vitality of Helpston’s rural community. Helpston Parish Council has not noted any such positive impact due to the developments that have already taken place, in fact, the self contained aspects of those that have been allowed to take place within the village have had the effect of creating fragmented communities within the village.

“3.4 The NPPF identifies the importance of promoting the retention and development of local services and community facilities in a village, such as:

local shops, meeting places, sports venues, cultural buildings, public houses and places of worship

3.5 The NPPG states ‘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’.”

However the Proposed Local Plan does not propose any further allocations in **Small Villages** which appears to be a blanket policy determining that only **Medium and Large Villages** are considered for growth even though some small villages may benefit from some growth despite not meeting the appropriate criteria. Many small villages are geographically very close to larger neighbours whose facilities they use. Allowing some development would allow medium villages to consolidate recent existing developments into the rural context whilst benefiting from the controlled growth of their neighbours critically in enhancing and sustaining facilities mentioned in 3.4 above. Additionally the hierarchy determinants relate to what is the “status quo” and appears to deny small villages from benefiting from what small developments may accrue to them in the future.

Indeed, the designated **Small Villages** offered some nine potential sites (including the old Wildfowl Centre at Peakirk...now unused) that could easily have absorbed the 60 of the 82 properties designated to HEL008H at Helpston. Six new properties in each of these **Small Villages** would have had minimum adverse impact on any of them (in fact the opposite might apply as noted above). But the City’s draft Local Plan has simply rejected ALL the sites in the Small Villages with the unilateral statement that “the Plan does not propose further allocation in small villages”. No evidence or reason for this policy is provided in the plan.

Also a further blanket statement used about sites submitted in the Small and Medium Villages....

“Sufficient sustainable sites have been selected within the urban area of Peterborough and the larger villages so that an allocation in this village is not required”

Within the eight Medium Villages referred to in the draft plan there were originally 31 sites offered for 2049 houses and all but two of these are rejected, some by using the statement quoted above. HEL006H (now HEL008H) and WIT003H were accepted or selected as “preferred” suggesting that HEL008H **had been**

identified from the outset and that all other sites that may have been acceptable have been dismissed in order to substantiate the preference for HE008H.

Similarly, rejections are justified in conclusion remarks because the proposed developments are detached from or do not form part of the main settlement. But in allowing SA6.12 at Broadwheel Road (in the current Local Plan) to proceed, Peterborough Planning Authority did not appear to consider its location relative to the rest of the village. To allow the preferred site HEL008H to proceed now would be to compound the mistake already made ensuring yet another enclave of isolated development that runs counter to NPPF policies.

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Planning Policy, Cohesion and Quality

NPPG paragraph 28 states:-

“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.**

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.”

Again there is no evidence, actual or implied that these aspects have been considered. There is certainly no evidence that Peterborough Planning Authority has set an agenda that encompasses any of these aspects when it allowed previous developments in Helpston. Indeed the value provided by maintaining a rural network around the City has been eroded by the lack of a structured plan of expansion resulting in pockets of development that do not enhance cohesion or provide the rural social context that so many apparently aspire to. Whilst Peterborough City Council may wish to sell “Peterborough” as a product and Helpston is seen as an attractive part of that product none of the Section 106, POIS or CIL money that has accrued to the City Council has been used to enhance the core of the village or its facilities. There is no indication that this policy will change with the preferred site if it is developed.

Additionally paragraph 50:

“To deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning authorities should:

- **plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes)**
- **identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand.”**

The assessment of current and future demographic trends has not been applied to Helpston in the context of market trends as the identification of HEL008H as a site reflects neither the lack of demonstrated need for further housing in the village nor has it taken into account the limits of the facilities and infrastructure available. There is no evidence that there is a demand for housing in Helpston although it is accepted there is a national demand for housing as set out by the Government that will be processed by the Peterborough Local Plan.

Paragraph 55 provides advice on designs :

“Such a design should:

- **be truly outstanding or innovative, helping to raise standards of design more generally in rural areas**
- **reflect the highest standards in architecture**
- **significantly enhance its immediate setting**
- **be sensitive to the defining characteristics of the local area.”**

The last completed development and the current ongoing development on land to the west of Broadwheel Road have not met any of the above criteria and no assurance has been provided that the preferred site will not be populated by a similar style of development. Indeed Peterborough Planning Authority has provided no assurances that paragraph 55 will be considered in any application for development.

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Further Comments

Peterborough Planning Authority recently refused an application for housing development in Barnack. It is arguable that the City's reasons for its refusal apply equally to Helpston in every respect and which has an historical growth well in excess of that of Barnack. Helpston has grown from 331 dwellings prior to the last two local plans to 473 to date (42% increase) and will grow to 550 (65% increase) if HEL008H is included in the new plan. **That increase is a more than doubling of the housing stock in what was once a Limited Rural Growth Village....that is just not sustainable and we contend that within the locality, City could not give a similar example of such an unprecedented scale of growth!**

Coupled to this is a factor alluded to in the Peterborough Settlement Hierarchy Study which is that of the East Coast Mail Line level crossing. Continuous development will obviously see an increase in volumes of road and rail traffic; the question has to be asked if the available infrastructure would be able to cope with a further large development within Helpston from where the majority of the working population has to cross that busy main line on the B1443 every day.

The earlier Highways Impact assessment of HEL006H states that

“A transport statement will be required. No highway objection to the principal, however significant off-site highway works will be required to fully reconstruct Broadwheel Road and widen to current standards and provide a footway along the site frontage. Adequate access in line with current standards, good pedestrian connectivity and parking in accordance with PP13 are essential”.

This assessment will apply equally to HEL008H.

The nature of the significant work indicates that Broadwheel Road will no longer be part of the rural infrastructure with its narrow lane and single carriageway but will become just another road to carry away increased volumes of traffic.

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Additional information

The Settlement Hierarchy Study awards a value to factors that eventually determine the hierarchical outcome of each rural settlement and their acceptability for inclusion in the Local Plan which has resulted in Helpston being identified as having those attributes that place it in the “**Medium Village**” category. John Clare Primary school is already over subscribed and has no room for expansion yet the Primary School Capacity statement claims “**John Clare could be extended if additional land available**”. Whilst HEL008H could alleviate this problem, SA6.12 was also ideally suited as a provider of this additional land but no provision appears to have sought or considered when that development was permitted. Similarly there is limited scope for expansion at Arthur Mellows Village College in Ginton

Public transport is regular and available apart from Sunday. However there is no service later in the evening for members of the public who wish to avail themselves of cultural or retail opportunities that Peterborough, Stamford or Bourne provide. The early morning provision each hour does not give sufficient flexibility to travel arrangements or working times that a more frequent service, such as those enjoyed by Peterborough, would provide.

The Parish Council and various residents groups have sought to improve the community facilities of Helpston and City Council Officers / Elected Councillors have been lobbied for support over a number of years. In essence, support has been notional only, as funding has always been seen as an issue.

Many subjective comments to oppose this development have been made at Parish Council and Community meetings but by examining the detail of the rationale behind the Local Plan with reference to HEL008H it becomes evident that there are grounds for opposing the preferred site within the documentation supplied to support the Local Plan. Certainly there are conflicting statements when one site is posed against another but wider considerations and historical factors appear not to have been given credibility.

When we first wrote to City objecting to the site known as HEL006H, we noted with some trepidation that site HEL001H was rejected by City but within that very rejection City included the ominous words “....could be linked with HEL006H....”

The City / Landowners appear to have somehow come together to do just that, by making **HEL006H and HEL001H into the site HEL008H** now included in the Proposed Local Plan. Are we likely to receive an explanation of how that came about??

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Conclusion

In conclusion, Helpston Parish Council submits that the Proposed Peterborough Local Plan is unsound and that site HEL008H should be removed from it as a site and that consideration should be given to the alternatives outlined for Small Villages, to some of the rejected sites in Medium Villages elsewhere, or to some of the many rejected Brownfield sites offered within the urban areas,

Yours sincerely,

S Smith,
Clerk to Helpston Parish Council