F/YR25/0729/PIP

Applicant: Mr W Savage Agent : Mr R Papworth

Morton & Hall Consulting Ltd

Land North Of 10, Primrose Hill, Doddington, Cambridgeshire

Permission in Principle to erect 4 workplace dwellings

Officer recommendation: Refuse

Reason for Committee: Number of representations contrary to Officer

recommendation.

1 EXECUTIVE SUMMARY

- 1.1 This application seeks Permission in Principle (PiP) for the development of four workplace dwellings on Land North of 10 Primrose Hill, outside the developed footprint of Doddington.
- 1.2 Under Policies LP3 and LP12 of the Fenland Local Plan, the site is located immediately adjacent to the built-up settlement of Doddington. However, development of this site would introduce a formal, linear extension into the open countryside, which does not respect the rural character or sporadic settlement pattern as the village is exited. It would result in unacceptable urbanisation and set a precedent for future development, further eroding the open character of this area.
- 1.3 Furthermore, the site lies partially within in Flood Zones 2 and 3. The application is not accompanied by a sequential test and as such insufficient assessment has been undertaken and inadequate information submitted to demonstrate that it is not possible for the development to be located on a site with a lower risk of flooding.
- 1.4 The proposal is for up to 4 dwellings on a site of approximately 0.99 hectares, equating to approximately 4 dwellings per hectare. It could therefore be argued that this development underutilises the land. However, Policies LP12 (c) and (d) and LP16 (d) require developments to respond to the local character in this regard, as does Paragraph 135 of the NPPF; densities in the area do vary and as such this, and the loss of Grade 3 Agricultural land against the context of best and most versatile land within Fenland, are not put forward as further reasons for refusal.
- 1.5 Given the above considerations, this application is recommended for refusal.

2 SITE DESCRIPTION

2.1 The site is situated immediately to the west of the built form of the settlement of Doddington and is in fallow agricultural use. Adjacent development consists of dwellings at Turnpike Close to the east, and 10 Primrose Hill to the south-west. Arable fields are located to the north, west and south of the site. The site is

- bordered by frontage trees to the southern boundary, open fields to the west and north, with a 1.8 metre high fence at the eastern boundary.
- 2.2 The site topography slopes gently away from the highway with a drain located to southern frontage of the site. The site is located in Flood Zone 1, 2 and 3, with two of the four dwellings located in in Zones 2 and 3 toward the west of the site. The western half of the site is subject to a low, medium and high annual likelihood of surface water flooding.

3 PROPOSAL

- 3.1 A location plan and an indicative site layout (although not a requirement of a PiP application) accompany this submission. The indicative site layout proposes a new 5.5 metre wide shared access road in the south-west corner of the site leading to four dwellings with detached work units. The dwellings shown face onto Primrose Hill with large rear gardens containing a pond and planting around the site boundaries.
- 3.2 The current proposal is the first part of the Permission in Principle application; this 'first stage' establishes whether a site is suitable in principle only, and assesses the 'principle' issues, namely; (1) Location (2) Use, and (3) Amount of development proposed
- 3.3 Should this application be successful the applicant will have to submit a Technical details application covering all the other detailed material planning considerations. The approval of Permission in Principle does not constitute the grant of planning permission.
- 3.4 The applicant is only required to submit a completed application form, a plan which identifies the land to which the application relates (drawn to scale and with a north point) and the application fee.
- 3.5 Full plans and associated documents for this application can be found at: https://www.publicaccess.fenland.gov.uk/publicaccess/

4 SITE PLANNING HISTORY

Reference	Description	Decision
F/YR22/0812/PIP	Residential development of up to 9 x dwellings	Withdrawn
	involving the formation of 2 x new accesses	- 14 July
	(application for Permission in Principle)	2022
F/YR23/0113/PIP	Residential development of up to 9 x dwellings	Refused –
	(application for Permission in Principle)	27 April
		2023

5 CONSULTATIONS

5.1 Doddington Parish Council – 04 November 2025

Objection – The Parish Council expresses concerns regarding: Highway Safety Ribbon Development Biodiversity Impact Contrary to Policy LP3 of the Local Plan

A large number of existing workplace homes elsewhere in the district have had the units converted into separate residential use or annexe use.

5.2 Cambridgeshire County Council – Archaeology – 14 November 2025

Our records indicate that the development lies in an area of high archaeological potential, to the west of Doddington, near the edge of the existing settlement. Whilst outside the settlement edge location there is the cropmark remains of a network of Medieval ridge and furrow extending around the north of the proposed development (Cambridgeshire Historic Environment Record ref. 09674). It is located near the edge of the fen island on which the village is situated and this is known as a favoured location for activity in the past particularly in pre drainage times. Just to the west of the proposed development finds of Roman pot confirm activity in the area (CHER 10888, 03778).

Whilst this site lies in an area of archaeological interest, we cannot make specific recommendations without further understanding of the scale and impacts of the proposed development. We are however content that no works are required prior to determination of an application and consequently we wish to raise no objections for this application to secure Planning In Principle, however we would request to be consulted on any future planning application for development within the redline area indicated, with the expectation that a condition on development, if required, could be secured at Technical Details stage.

5.3 Fenland District Council – Environmental Services – 24 October 2025

Looking at document 'Indicative Proposed Site Plan' will the refuse bins be left by the kerbside on collection days?

- 1. New residents will require notification of collection and storage details by the developer before moving in and the first collection takes place.
- 2. Refuse and recycling bins will be required to be provided as an integral part of the development.

5.4 Cambridgeshire County Council – Highways – 23 October 2025

No objection – After a review of the submitted information and indicative highway boundary extent in the area. I have no objection to the principal of the developments access location or the construction of a footway along the Primrose Hill leading to the village of Doddington. Whilst I have no objections to the principle of the development and its associated infrastructure, to facilitate its construction. This response is not acceptance of the shown layout, location or design from the highway's authority. IN the later stages of this application or should a separate application be received all and any works within the highway and any access points with it must meet the current highways authorities guidance at that time.

5.5 Fenland District Council – Environmental Health – 15 October 2025

No objection – In the event that Permission in Principle (PIP) is granted and a further application for the site is submitted in the future, owing to the scale of the proposed development and close proximity to existing residents, this service requests the submission of a robust Construction Environmental Management Plan (CEMP) in line with the template for developers, available on Fenland District Council's website at: Construction Environmental Management Plan: A template

for development sites (fenland.gov.uk) The CEMP shall be expected to include working time restrictions to negate the need for a separate condition.

5.6 Environment Agency – 10 October 2025

No objection – Requests IDB are consulted. States development should be assessed against the Flood Risk Sequential Test.

5.7 Local Residents/Interested Parties

Comments of objection have been received from a property on Turnpike Close in Doddington, which is beyond the eastern boundary of the site.

Objecting Comments	Officer Response
Disturbance from business operations to	This will be addressed in the Use section.
existing residents.	
Not brownfield land.	This will be addressed in the Use Section.
Wildlife impact.	This will be addressed in the Matters Raised
	During Consultation section.
Foul water drainage provision.	This will be addressed in the Matters Raised
	During Consultation section.
Number of storeys	This will be addressed in the Matters Raised
	During Consultation section.
Loss of view	This will be addressed in the Matters Raised
	During Consultation section.

Seven comments of supports have been received. Three are from Doddington, on Benwick Road, Turf Fen Lane and Askham Row. Two supporters are from Chatteris, on Gull Way and Lode Way. One supporter is from Brewin Avenue in March, and one is from Williams Way in Manea. The nearest supporter is nearly 800 metres from the proposal site.

Supporting Comments	Officer Response	
The dwellings are in close vicinity to the settlement.	This will be addressed in the Location section.	
Similar proposals are nearby.	This will be addressed in the Use section.	
There is a need for occupational dwellings.	This will be addressed in the Use section.	
There is a housing need in the area.	This will be addressed in the Use section.	
This will benefit the local economy	This will be addressed in the Use section.	
This will retain business owners.	This will be addressed in the Use section.	
Building the homes will encourage local businesses to join the community	This will be addressed in the Use section.	

6 STATUTORY DUTY

6.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires a planning application to be determined in accordance with the Development Plan unless material planning considerations indicate otherwise. The Development Plan for the purposes of this application comprises the adopted Fenland Local Plan (2014).

7 POLICY FRAMEWORK

National Planning Policy Framework (NPPF) 2024

Chapter 2 - Achieving sustainable development

Chapter 4 – Decision-making

Chapter 5 – Delivering a sufficient supply of homes

Chapter 9 – Promoting sustainable transport

Chapter 11 – Making effective use of land

Chapter 12 – Achieving well-designed places

Chapter 14 – Meeting the challenge of climate change, flooding and coastal change

Chapter 15 – Conserving and enhancing the natural environment

Chapter 16 – Conserving and enhancing the historic environment

National Planning Practice Guidance (NPPG)

Context Paragraph: 012 (Reference ID: 58-012-20180615). The scope of permission in principle is limited to location, land use and amount of development. Issues relevant to these 'in principle' matters should be considered at the permission in principle stage. Other matters should be considered at the technical details consent stage. In addition, local authorities cannot list the information they require for applications for permission in principle in the same way they can for applications for planning permission but can advise applicants on the decision notice, where Permission in Principle is granted, what they would expect to see at Technical Details stage.

National Design Guide 2021

Context

Identity

Built Form

Movement

Nature

Uses

Homes and Buildings

Fenland Local Plan 2014

- LP1 A Presumption in Favour of Sustainable Development
- LP2 Facilitating Health and Wellbeing of Fenland Residents
- LP3 Spatial Strategy, the Settlement Hierarchy and the Countryside
- LP4 Housing
- LP5 Meeting Housing Need
- LP12 Rural Areas Development Policy
- LP13 Supporting and Managing the Impact of a Growing District
- LP14 Responding to Climate Change and Managing the Risk of Flooding in Fenland
- LP15 Facilitating the Creation of a More Sustainable Transport Network in Fenland
- LP16 Delivering and Protecting High Quality Environments across the District
- LP18 The Historic Environment
- LP19 The Natural Environment

Delivering and Protecting High Quality Environments in Fenland SPD 2014

- DM2 Natural Features and Landscaping Schemes
- DM3 Making a Positive Contribution to Local Distinctiveness and character of the Area

Cambridgeshire Flood and Water SPD 2016

Emerging Local Plan

The Draft Fenland Local Plan (2022) was published for consultation between 25th August 2022 and 19 October 2022, all comments received will be reviewed and any changes arising from the consultation will be made to the draft Local Plan.

Given the very early stage which the Plan is therefore at, it is considered, in accordance with Paragraph 49 of the NPPF, that the policies of this should carry extremely limited weight in decision making. Of relevance to this application are policies:

LP1: Settlement Hierarchy

LP2: Spatial Strategy for the Location of Residential Development

LP4: Securing Fenland's Future

LP5: Health and Wellbeing

LP7: Design

LP8: Amenity Provision

LP12: Meeting Housing Needs

LP18: Development in the Countryside

LP19: Strategic Infrastructure

LP20: Accessibility and Transport

LP22: Parking Provision

LP24: Natural Environment

8 KEY ISSUES

- Location
- Use
- Amount

9 BACKGROUND

- 9.1 The proposal is an application for Permission in Principle to develop the site for 4 dwellings. The Permission in Principle route has 2 stages: the first stage (or Permission in Principle Stage) establishes whether the site is suitable in principle and assesses the principle issues namely:
 - (1) Location
 - (2) Use, and
 - (3) Amount of development proposed

And the second (Technical Details Consent) stage is when the detailed development proposals are addressed. Technical details consent would need to be applied for should the application be granted.

9.2 Evaluation of a PIP must be restricted to the issues highlighted above; even if technical issues are apparent from the outset these can form no part of the determination of Stage 1 of the process, Accordingly, some matters raised via statutory bodies may not be addressed at this time.

10 ASSESSMENT

Location

10.1 Policy LP3 of the Local Plan defines Doddington as a growth village. For these settlements, development and new service provision either within the existing urban area or as small village extensions will be appropriate, albeit of a considerably more limited scale than appropriate to market towns. Given the site is adjacent to existing built form, development could therefore be considered as an

- extension to the village but must also comply with the more detailed policy criteria set out in Policy LP12 as well as Policy LP3.
- 10.2 The application site adjoins Turnpike Close to the east and as such would be adjacent to the existing developed footprint of the village. However, Turnpike Close (along with 8 Primrose Hill on the southern side of the road) is considered to be the edge of the built form, with development further west along Primrose Hill being sporadic frontage development of a rural nature, separated by fields and becoming sparser as the settlement is exited.
- 10.3 Development of this site would introduce a formal, linear extension into the open countryside, which does not respect the rural character or sporadic settlement pattern as the village is exited, it would result in an unacceptable urbanisation and set a precedent for future development, further eroding the open character of this area. As such, the proposal is considered contrary to Policy LP12 Part A (c), (d) and (e) which seek to ensure development would not have an adverse impact on the character and appearance of the surrounding countryside and would not result in linear development. Furthermore, Policy LP16 (d) of the Fenland Local Plan, Policy DM3 of Delivering and Protecting High Quality Environments in Fenland SPD, seek to ensure that developments make a positive contribution and are sympathetic to the local distinctiveness and character of the area, recognise the beauty and character of the countryside and do not adversely impact on the landscape character.
- 10.4 The site lies partially within in Flood Zones 2 and 3; Policy LP12 Part A (j) seeks to ensure that developments would not put people or property in danger from identified risks, such as flooding. Policy LP14 of the Fenland Local Plan and Chapter 14 of the NPPF seek to steer developments to the areas with the least probability of flooding and development will not be permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The application is not accompanied by a sequential test and as such insufficient assessment has been undertaken and inadequate information submitted to demonstrate that it is not possible for the development to be located on a site with a lower risk of flooding and as such the development is contrary to the aforementioned policies.
- 10.5 The site comprises of approximately 0.99ha of Grade 3 Agricultural land as defined by DEFRA (Defra Spatial Data Download) and classified as good to moderate.
- 10.6 Policy LP12 ((i) states that development should not result in the loss of high grade agricultural land or if so comprehensive evidence is provided to justify the loss. Para 187 of the NPPF recognises the intrinsic character and beauty of the countryside, including the economic and other benefits of the best and most versatile (BMV) agricultural land (defined as Grades 1, 2 and 3a) and para 188 (footnote 65) advises that where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality.
- 10.7 Having regard to the wider DEFRA mapping site, it is acknowledged that a significant majority of the Fenland District falls within the BMV land with only the urban areas of the main Market Towns, the Kings Delph and Morton's Learn areas and the north of March including the prison area falling within the lower grades. As such, it is recognised that there are very few areas of poorer quality agricultural land, and it would not be possible therefore for Fenland to meet its housing demands without developing areas of BMV land.

- 10.8 This does not however confer that all agricultural land should be developed, especially where it relates more to open countryside than to the settlement and Officers consider that this is the intention of LP12, Part A (c), supported by the preamble at paragraph 4.7.1 of the Fenland Local Plan. An assessment however should be made as to the relationship of the land to the open countryside, in comparison to the built envelope of the settlement. As stated in the section above, the application site is considered to relate more to the open countryside than the built form, though it is acknowledged that 0.99ha is not significant in the context of BMV land within Fenland.
- 10.9 The area in the vicinity of the site is unlit but is served by a footpath linking to the centre of the village. There is a bus stop located to the frontage of site which can provide a public transport link to good and services in Doddington, Chatteris and beyond. However, it is not considered that these facilities overcome any other harm identified.
- 10.10 It is noted that the Agent has advised of other occupational / workplace developments having been approved at Charlemont Drive, Manea, as well as George Way and Albert Way in Chatteris. Each application must be determined on its own merits. Notwithstanding this basic principle, it is considered that the sites are materially different in that these dwellings are considered to be within the established settlement and have different relationships to the consolidated built form of those settlements. To allow workplace dwellings in this location would set a harmful development precedent that would have an adverse urbanising impact on an area of open countryside that is beyond the edge of the built up settlement of Doddington. Additionally, no justification or evidence of the need for workplace homes has been submitted in respect of this argument.
- 10.11 Development of this site would introduce a formal, linear extension into the open countryside, which does not respect the rural character. It would result in an unacceptable urbanisation and set a precedent for future development, further eroding the open character of the area, as well as introducing unjustified development into an area of flood risk, which would clearly be contrary to policies LP12, LP14 and LP16 of the Local Plan.
- 10.12 Policy LP5 sets out the housing targets for the District and the Council has undertaken a full assessment of the Five Year Housing Land Supply in the District and has concluded that the Council is able to demonstrate a supply of specific deliverable sites sufficient to provide for more than Five Years' worth of housing against the Council's identified requirements. This is a material consideration and means that any application for new development must be determined in accordance with the development plan unless material considerations indicate otherwise.

Use

10.13 The site is situated close to existing development in the open countryside, however as stated above, it will be contrary to Policy LP12 – Rural Areas Development Policy and Policy LP16 – Delivering and Protecting High Quality Environments across the District. The introduction of residential workplace units and associated paraphernalia is considered to erode the character and appearance of the open countryside. It is therefore considered that the site is not acceptable to use for new dwellings.

- 10.14 In addition, whilst perhaps being a matter more appropriate for consideration at Technical Consent stage, the location of the site for commercial activity and the established dwellings does raise potential issues around noise and whether a high quality residential environment would ultimately be created.
- 10.15 Supporters of the proposal state that there is a need for occupational dwellings, however, no supporting information has been provided to demonstrate this unsustainable location has sufficient demand for workplace homes. Additionally, no existing or proposed businesses have been identified to fill the workplace units. Supporters state that the housing will help retain local entrepreneurs and professionals, however, that does not justify development in an unsustainable location in Flood Zone 3.

Amount of Development Proposed

- 10.16 The application seeks Permission in Principle for four dwellings on a site of 0.997 ha which will equate to a density of approximately 4 dwellings per hectare. This is low density and could comfortably be accommodated on-site without being considered an overdevelopment of the site. However, the detailed layout and design will be for consideration at the Technical details stage. In terms of consideration of amount, the proposal is acceptable. When compared to dwellings within the built-up settlement limit the amount of development is considered to be an underutilisation of the site. However, the quantum of development is in keeping with the plot sizes of rural dwellings in an 'Elsewhere' location to the west of the site.
 - 10.17 An objection has been raised as to the potential size of the proposed dwellings, however, the proposed design is indicative, and therefore no planning weight can be given to these comments at this stage of the planning process.

Matters Raised During Consultation

- 10.18 It should be noted that a number of supporting letters have commented noting that the provision of four dwellings will not impact on highway safety or increase congestion. These comments are noted, and this does form a material consideration as part of this assessment, but as discussed above there are no concerns, in respect of highway matters to the amount of development proposed.
- 10.19 It is also noted that the Parish Council have raised concerns in terms of congestion and the associated Highways impact of the proposal, however, Cambridgeshire County Highways have raised no concerns at this stage, with any additional details being secured at the Technical Details stage or subject of a subsequent application. Further given that the proposal relates to four dwellings this quantum of development, is unlikely to result in sufficient harm, to justify the refusal of the application contrary to the Highway Authority's recommendation.
- 10.20 Comments have been raised about impact on wildlife however, this is a matter which is not attributed material weight at this stage of the application process. Additional public comments raise overlooking concerns, however, this is a matter that could only be determined at the Technical Details stage. Some comments points to the national housing shortage, however it is not role of the Local Planning Authority to address under provision elsewhere in the country when we are exceeding our five year housing land supply with a total of 6.6 years provision.

10.21 It is important to note that a previous Permission in Principle application for this site under F/YR23/0113/PIP was recommended for refusal and subsequently refused by the Planning Committee of 26 April 2023 on the basis of a harmful incursion into the countryside and flood risk. Aside from the quantum of development there has been no major changes to the proposal, or to local or national planning policy, and this should be a significant material consideration when this application is assessed.

11 CONCLUSIONS

- 11.1 This application seeks 'Planning in Principle' (PiP) for residential development of up to 4 dwellings, where only in principle issues are assessed, namely the location, use and amount of development. All matters of detail would be subject to a Technical Details application should this submission be successful and accordingly, matters raised by consultees may not be addressed at this time.
- 11.2 Development of this site for residential purposes would introduce a formal, linear extension into the open countryside, which does not respect the rural character or sporadic settlement pattern as the village is exited, it would result in an unacceptable urbanisation and set a precedent for future development, further eroding the open character of this area.
- 11.3 Furthermore, the site lies partially within in Flood Zones 2 and 3. The application is not accompanied by a sequential test and as such insufficient assessment has been undertaken and inadequate information submitted to demonstrate that it is not possible for the development to be located on a site with a lower risk of flooding.
- 11.4 The proposal is for up to 4 dwellings on a site of approximately 0.99ha, equating to approximately 4 dwellings per hectare, it could therefore be argued that this development does not make an effective use of land. However, policies LP12 (c) and (d) and LP16 (d) require developments to respond to the local character in this regard, as does paragraph 135 of the NPPF; densities in the area do vary and as such this, and the loss of Grade 3 Agricultural land against the context of BMV land within Fenland, are not put forward as further reasons for refusal.

12 RECOMMENDATION

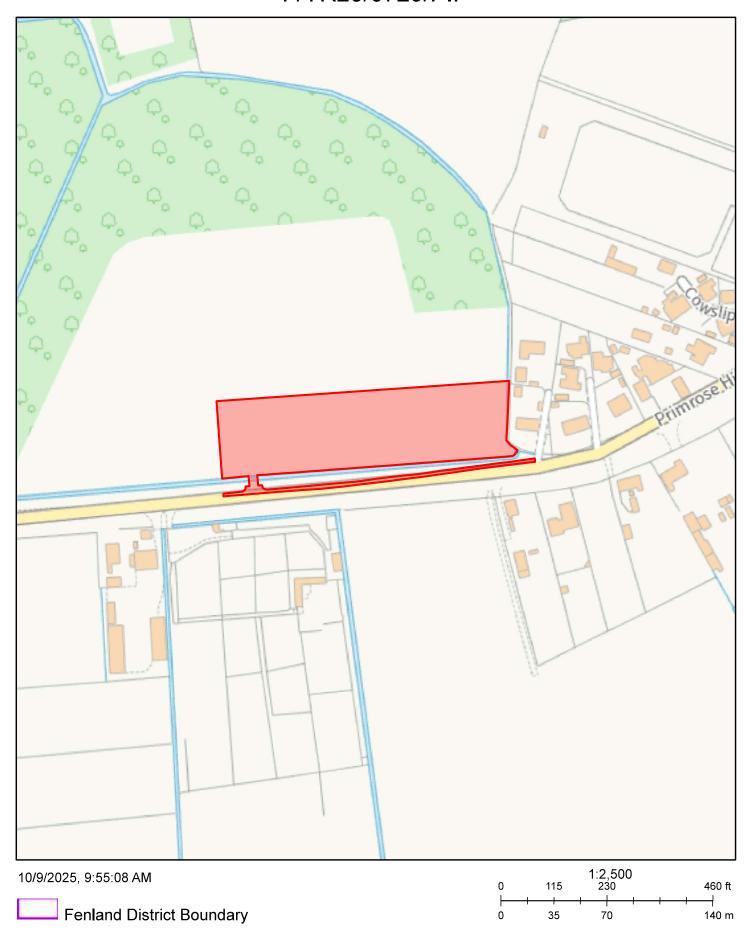
Refuse; Permission in Principle for the following reasons:

- The application site constitutes an area of land located outside the developed footprint of Doddington. Development of this site would result in an unacceptable urbanisation, constituting ribbon development into the countryside. It would likely set a precedent for future development, further eroding the character of the area and the open countryside. The development proposal will be in an 'elsewhere' location contrary to Policies LP3 and LP12 of the Fenland Local Plan (2014). As such any residential development on this site will be contrary to the above policy considerations and thus, in terms of location and use, the Planning in Principle application fails.
- 2. The site lies partially within in Flood Zones 2 and 3; Policy LP12 Part A (j) seeks to ensure that developments would not put people or property in dangers from identified risks, such as flooding. Policy LP14 of the Fenland Local Plan and

Chapter 14 of the NPPF seek to steer developments to the areas with the least probability of flooding and development will not be permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding.

The application is not accompanied by a sequential test and as such insufficient assessment has been undertaken and inadequate information submitted to demonstrate that it is not possible for the development to be located on a site with a lower risk of flooding and as such the development is contrary to the aforementioned policies.

F/YR25/0729/PIP



Fenland District Council



