

## Extra Comments on Question 27 - Refining the existing settlement hierarchy

I support a hierarchy that retains the towns and Cranbrook but has a lower number of villages to accommodate growth.

In this respect I believe that the hierarchy should exclude 'small' villages with less than 1500 population within the AONB from development allocations. This hierarchy would also exclude 'larger villages' in the AONB (with more than 1500 population) if they have severe environmental constraints. This would mean excluding East Budleigh, Kilmington, Musbury, Sidbury and possibly Beer.

It would however be possible to include more villages outside the AONB if they have a population above 1500 and some basic facilities.

The hierarchy should also include, if required, new town(s) or a new village(s) outside the AONB to compensate for less capacity to allocate development within AONB villages.

### Proposed Hierarchy

<b>Tier 1</b>	West End, North of Blackhorse, Pinhoe and Cranbrook
<b>Tier 2</b>	Seven large towns, new town(s) or village(s) outside AONB if required
<b>Tier 3</b>	Small towns and 'larger' villages with populations over 1500 (primarily outside the AONB) with basic facilities. Allocations to generally be no more than 5% of the number of houses in the village or town  Broadclyst, Clyst St Mary, Colyton, Feniton, Lymptone, Newton Poppleford, Uplyme, West Hill, Whimble, Woodbury
<b>Tier 4</b>	Villages within the AONB and those outside the AONB with populations under 1500 people. Small scale development ( up to around 15 houses ) on 'exception sites' when an robust up to date affordable housing survey of the village, supported by the Parish Council, shows a demonstrable need for affordable housing(similar to Strategy 35 in current plan)
<b>Tier 5</b>	Open countryside and hamlets

This approach aims to protect the AONB and provide more economical, socially and environmentally sustainable development by:-

- Giving considerable weight to the environmental sustainability of villages by primarily excluding villages in AONB from the 'larger' village category of the settlement hierarchy.
- Excluding villages with populations below 1500 people from the larger' village category of the settlement hierarchy. All villages with under 1500 people in the AONB to be excluded.
- Recognising most villages do not have a wide range of facilities and services to stop frequent car journeys and are not capable of achieving them through environmentally sustainable growth.

## Justification

### **The current hierarchy fails to take into account environmental constraints**

Environmental constraints include being within the AONB but could also include areas of flooding, having conservation areas, being close to statutory ecological sites and non-statutory ecological sites (i.e. SLA, SPA, SSSI, county strategic wildlife sites) and new significant wildlife areas that are being created i.e. lower otter project, having landforms that means any development would be very prominent in the landscape and the impact on important local views (near and far) etc.

**Environmental sustainability** is thus given too little consideration in the current settlement hierarchy, a major omission, given the sensitivity of the AONB landscape and biodiversity of the villages in the AONB. Some of the options for the number of dwellings required up to 2040, some of the settlement hierarchy options and some of the dwelling distribution options could destroy the character and landscape of some villages in the AONB if they were implemented. The only way to prevent this happening is to place significant restrictions on development in the AONB by taking villages in the AONB out of the 'larger' village settlement category. Otherwise there is a risk they are allocated environmentally unsustainable growth and/or they become open to speculative environmentally unsustainable growth if housing delivery targets are not met.

Taking account of environmental sustainability is a major objective of the NPPF (2019). Para 7 states there is a clear ambition to continue to deliver sustainable development. Para 8 reiterates the three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways in order to achieve sustainable development: - economic, social and environmental objectives. Meanwhile paragraph 20 reiterates that Local Plans should "set out an overall strategy for the pattern, scale and quality of development" it states this should take into account the three main objectives that contribution to positive sustainable development.

In addition a recent government white paper suggests areas within the AONB should be protected from major development. This protected status may also extend to conservation areas, areas of flooding, high grade agricultural land, statutory and non-statutory ecological sites etc. Please note there is no definition of large scale in the NPPF. In para 172 and 173, large scale depends on a site's nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined. In a small village of say under 500 dwellings 15 could be large scale.

It should also be noted in the NPPF para 172 the emphasis is on developing outside a designated area unless there are no alternative options. There are other options that could be pursued as your document outlines.

It is also possible the AONB could become a National Park in the future so this represents a resilient approach to policy.

## **The current settlement hierarchy does not take into account the limited capacity and potential of 'small' villages (under 1500 population) in the AONB to take growth**

Population size, is often a broad indication of the local market and need for services, together with the potential for developing local communities. Many 'small' villages, particularly with populations below 1500 people, as well as many larger villages, have limited facilities and infrastructure. In particular villages in the AONB, due to their environmental constraints have limited potential to take growth that would not destroy the character of the village and the AONB landscape other than 'local needs based' growth such as affordable housing under a policy similar to Strategy 35.

Often all these villages have is a small community shop, small community hall, a public house and maybe a primary school which can already be sustained without extra growth. Most however lack many vital everyday services including employment opportunities, post offices, banks, chemists, medical facilities, food shops to meet other essential food needs such as for fresh produce, bus services to employment centres etc. As well as having dubious social sustainability, future residents will remain car dependent for accessing services and facilities.

Most importantly allocating growth to these villages would have to be of a scale that would destroy the environment and biodiversity of these villages without reaching a population size to obtain a greater range of services and facilities.

Rather than allocating large sites in village of under 1500 population within the AONB where many may become second homes it is better to restrict growth to small scale developments (15 dwellings or less) under a policy like Strategy 35 to ensure the houses that do get built meet the specific needs of the village and thus would have a more beneficial effect on the social fabric of the community.

### **Example of East Budleigh**

- East Budleigh should be removed from the 'larger' village category of the current settlement hierarchy.
- The village is not large with a population below 1000 people and only about 400 houses.
- Environmentally the village is extremely constrained as follows:-
  - It is within an AONB landscape and very importantly the undulating nature of the landscape (i.e. steeply raising visible slopes with wooded skylines of Tidwell Mount, Hayes Ancient Wood and Shortwood Common provide iconic views in the village, prominent highly visible plateau's to the north etc.) would make any development very prominent when viewed both near and far within the AONB landscape and would severely impact on locally important views within the AONB landscape.
  - 20% of the village has the potential to flood. A risk that may increase with the Lower Otter scheme.
  - The village is surrounded by important statutory and non-statutory ecological designations i.e. Strategic Wildlife areas, Pebbled Heath SPA, SAC, SSSI, ancient woodland to the south and west. The Lower Otter project will further increase the ecological importance (for birds) of the village with the northern and eastern edge very close to this important likely to become international site of importance. Growth within 500m is undesirable to protect wildlife from predation from cats, local population incursion etc.

- The village is surrounded by high grade agricultural land (Grade 1). There will be significant loss of agricultural land for the Lower Otter project. In view of this it is important to retain what is left to maintain the viability of local farmers who are losing their land.
- The village has a conservation area and a highly important Grade 1 parks and gardens on the edge of the village.
- The population is sufficient to maintain current facilities such as the singular community shop but any growth other than small scale (up to 15 dwellings) achieved under a policy such as Strategy 35 could overwhelm the village character, its infrastructure and cause significant environmental and ecological damage.

**Potential methodology to determine which 'larger' villages with populations over 1500(primarily outside the AONB) should be included in the larger village category**

**Methodology**

**The methodology should take into account the three main aspects of sustainability:- environment, social and economic**

- The size of the population in a settlement is an indication of where growth is more capable of reaching a threshold size to support further services and facilities.
- The sensitivity of the environment i.e. whether the settlement is within an AONB and other constraining environmental features that could restrict growth. Small villages under 1500 population within an AONB should be excluded.
- The level of services and facilities available in each settlement, including local employment;
- Public transport availability and frequency;

So initially a village is judged to see it environmentally constrained i.e. in an AONB and if it has a population over 1500. If the population is under 1500 and is within an AONB it should be excluded from consideration for the 'larger' village category.

**A potential scoring system**

A scoring system is then applied to rank villages over 1500 population primarily outside the AONB according to the availability and relative importance of services and facilities available, which in turn informs a settlement hierarchy. The higher the settlement score the more socially sustainable it is considered to be i.e. by this stage villages that are not environmentally sustainable or small in size are excluded.

Scoring based on:-

- Key facilities and services as some key facilities (i.e. post office, convenience store or community shop) are more essential and used more frequently used by most people than others. These receive the highest scores.
- Key facilities used regularly by a section of the population i.e. primary and secondary schools
- Facilities and services that encourage community cohesion .i.e. community or church hall, café , public house.
- Other services, important but not vital for a settlement's sustainability. i.e. medical facility, chemist, vet, financial establishment or cashpoint, library, sports/recreation field, play area etc.

**Settlement Hierarchy Indicators (key facilities and services marked in bold)**

<b>Indicator</b>	<b>Facilities/population size/environmental constrains</b>	<b>Scoring/inclusion for consideration</b>	<b>Comments</b>
<b>Environmental considerations</b>	Outside AONB	If outside the AONB the village can be assessed for potential inclusion in 'larger' village category.	Villages outside AONB usually more environmentally sustainable
	Other environmental constraints	Assess other environmental constraints that could exclude a village from consideration for 'larger' village category	Some villages could have other constraints which make them environmentally unsustainable
<b>Population size</b>	Population greater than 1500 people	Villages with populations of over 1500 people can be assessed for inclusion in 'larger' village category, unless environmentally constrained.	Population threshold size above 1500 people could potentially support further growth and extra services and facilities
	Population less than 1500 people	Exclude villages with population under 1500 from consideration in 'larger' village category.	
<b>If a village passes the population size test (over 1500 population ) and is not deemed to be environmentally unsustainable (i.e. exclude all AONB villages under 1500 population and potentially those over 1500 population) it passes to the economic and social sustainability test)</b>			
<b>Retail</b>	<b>General Store/Community shop / farm shop</b>	5 points(more than five convenience shops)	A permanent general convenience store provides access to basic goods and reduces the need to travel by car.
		4 points( between 2-5 convenience shops)	
		3 points( one convenience store)	
	Comparison stores	3 points(more than five permanent comparison shops)	Comparison stores can reduce the need to travel
		2 points( between 2-5 permanent comparison shops)	
1 points( one permanent comparison shops)			
<b>Post Office</b>	3 points	A permanent post office provides access to financial and communication services and reduces the need to travel by car.	
Supermarket	2 points	A permanent supermarket can provide access to a wide range of	

Indicator	Facilities/population size/environmental constrains	Scoring/inclusion for consideration	Comments
			goods and reduces the need to travel by car
<b>Education</b>	Primary school	3 points	A primary school provides an opportunity to reduce the need to travel by car
	Secondary school	2 points	Access to a secondary school provides facilities for the wider community
<b>Community facility</b>	Public house	Maximum 1 point(1 pub or more)	Aside from serving food and drink, pubs and cafes provide a meeting place for people and can contribute to a sense of community.
	Cafe	Maximum 1 point(1 café or more)	
	Village Hall/Community Hall	Maximum 1 point(1 community hall or more)	Village halls are important community facilities, often providing a base for local organisations and community events
	Place of worship	Maximum 1 point (1 place of worship or more)	Provide community facility for people to meet and receive spiritual guidance
	Play area	Maximum 1 point (1 play area or more)	Children's play areas are valuable for the physical development of young people.
	Recreation area	Maximum 1 point (1 recreation area or more)	Sports/recreation grounds are important to encourage outdoor sports and general health and wellbeing. They also provide a home for local sports teams
<b>Employment</b>	Employment cluster	3(large number of businesses that employ a large number of people)	Provides important employment opportunities
<b>Other facilities</b>	General Medical Practice	1(1 GP practice or more)	Provides important healthcare facilities and services and the opportunity to access some medical facilities in the settlement. Reduces the need to travel by car.
	Chemist	1(1 chemist or more)	
	Dentist	1(1 dentist or more)	
	Vet	1(1 vets or more)	
	Optician	1(1 opticians or more)	
	Library	2(permanent library)	A library provides facilities available for use

Indicator	Facilities/population size/environmental constrains	Scoring/inclusion for consideration	Comments
			by the community. This provides an opportunity to access facilities within the settlement and reduces the need to travel by car.
	Bank cashpoint/financial establishment	1(1 cashpoint/financial institution of more)	Important access to financial services
	Hairdresser	1(1 hairdressers or more)	Facility used frequently to improve well-being
<b>Accessibility</b>	Hourly bus service	2	A regular bus service is important in providing a service for those without a car or as an alternative to car use.
	2 hourly bus service	1	
	<b>Railway station</b>	3	Important facility to link to large settlements