
F/YR25/0726/PIP

Applicant: Savage Developments Ltd

**Agent : Mr R Papworth
Morton & Hall Consulting Ltd**

Land South Of 29, Primrose Hill, Doddington, Cambridgeshire

Permission in Principle for 2 x 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 two dwellings on Land South of 29 Primrose Hill, outside the developed footprint of Doddington.
- 1.2 Under Policies LP3 and LP12 of the Fenland Local Plan, the site is considered to be in an 'Elsewhere' location, where new housing is only supported if it is demonstrably essential to a rural-based enterprise. No such justification has been provided. The development would therefore be in direct conflict with the settlement hierarchy and spatial strategy of the Local Plan.
- 1.3 The site lies within Flood Zones 1, 2 and 3. Built development is shown 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. It is therefore considered that the proposal is not in accordance with Policy LP14 of the Fenland Local Plan, 2014, and Chapter 14 of the National Planning Policy Framework, 2024.
- 1.4 Although the density of development proposed is low and could be accommodated physically on the site, this does not overcome the fundamental policy objections regarding location and use. Other technical details, including highway safety, would be addressed at the second stage (Technical Details Consent), though no objections have been raised by the highways authority at this stage.
- 1.5 Therefore, the proposed development fails to comply with the Local Plan's spatial strategy and the site's location remains unsuitable for residential development in principle.
- 1.6 Accordingly, this application is recommended for refusal.

2 SITE DESCRIPTION

- 2.1 The application site is located outside of the settlement footprint of Doddington, to the west side of Primrose Hill and is an agricultural field within an area characterised by its open, agricultural nature with some sporadic development. To the north of the site is 29 Primrose Hill which is a replacement dwelling. On the opposite side of Primrose Hill are a pair of barns which have been converted to residential. The site is bordered by post and rail fencing to the boundary with 29 Primrose Hill and open boundaries to the east, south and west.
- 2.2 The site topography slopes away from the highway with a drain located to the eastern frontage of the site and a separate drain to the southern boundary. The majority of the site is located in Flood Zones 2 and 3, with the north-eastern corner of the site located in Flood Zone 1. None of the site is subject to a low, medium or 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 north-east corner of the site leading to two 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

- 4.1 No relevant site history.

5 CONSULTATIONS

5.1 Doddington Parish Council – 04 November 2025

Object

Location - This part of Primrose Hill, being a significant distance from the developed boundary of Doddington, is open countryside where any proposed development needs to be fully justified by special circumstances. None have been provided to support these two PIP applications and the applications therefore conflict with FDC's Policy LP3. In addition, there is a conflict with policy LP12 as both developments would have an adverse impact on the character of the surrounding countryside.

Access - This section of Primrose Hill has a speed limit of 60mph whether traffic has left Doddington travelling towards Chatteris or heading towards Doddington from Chatteris. Any traffic needing access to or from the development under application F/YR25/0726/PIP must join Primrose Hill. Traffic needing access to or from the development under application F/YR25/0730/PIP will initially join Dykemoor Drove, a badly maintained track, before joining Primrose Hill. This area of Primrose Hill has no street lighting or a footpath along the roadway to cater for pedestrians. These dwellings together with their occupational units will create additional traffic movements thereby increasing the risk of accidents on this busy, fast road.

Workplace Units - No justification has been given that demonstrates there is a need for workplace units in Doddington. Similar developments to those being suggested have been built in Manea and Chatteris. Over the time since their development a significant number of them have been converted into residential use by the dwelling or are now used as residential annexes for relatives.

5.2 Cambridgeshire County Council – Highways – 22 October 2025

No objections - The applicant has shown a shared use access at a location with good visibility in either direction which appear to be within the highway extent. I would however note that all and any requirements for this access e.g. visibility splays, widths, material etc... will need to be shown on any future submissions and be to the correct guidance and specifications. As such this non objection by the LHA is just for the principal of the development and not agreement that is accurate at this stage or acceptable to the LHA.

5.3 Cambridgeshire County Council – Archaeology – 13 October 2025

Our records indicate that the development lies in an area of archaeological potential, on a spur of higher ground on the southern fen edge of Doddington where the land drops off to the deeper fen to the south. The fen edge was an area commonly settled and exploited during the prehistoric to Roman periods. This has been evidenced in the vicinity of the development area through findspots of a Neolithic ground flint axe (Cambridgeshire Historic Environment Record reference. 03677) and a late Bronze Age rapier (CHER ref. CB14520). Roman occupation has been recorded at Primrose Hill itself, through pottery and a hearth sealed by peat formed through later marine inundation (CHER ref. 03778). The finds were identified through deep ploughing, with hearth features and pottery being reported.

Whilst this site lies in an area of archaeological interest we cannot make specific recommendations without sight of a finalised site layout plan and an 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.

5.4 Fenland District Council – Environmental Health – 10 October 2025

No objection.

5.5 Local Residents/Interested Parties

Six communications of objection have been received. Five are from addresses in Doddington, namely Primrose Hill x 4 and The Grange . One further objection is from Doddington Road in Benwick.

Objecting Comments	Officer Response
Highway safety	This will be addressed in the Location section.
Development in an 'Elsewhere' location.	This will be addressed in the Location section.
Flood Risk and Drainage	This will be addressed in the Location section.
Impact on rural character	This will be addressed in the Location section.
Would set a development precedent.	This will be addressed in the Location section.
Commercial units not in an appropriate location.	This will be addressed in the Use section.
No evidence of workplace homes demand in the area.	This will be addressed in the Use section.
Loss of view	This will be addressed in the Matters Raised During Consultation section.
Potential overlooking	This will be addressed in the Matters Raised During Consultation section.
Impact on wildlife	This will be addressed in the Matters Raised During Consultation section
Size of proposed dwellings	This will be addressed in the Matters Raised During Consultation section.

Seven communications of support have been received. Three are from Doddington, on Benwick Road, Turf Fen Lane and Askham Row. Two are from Chatteris, on Gull Way and Lode Way. One supporter is from Williams Way in Manea and one from Brewin Avenue in March.

Supporting Comments	Officer Response
The dwellings are near an existing business	This will be addressed in the Location section.
The dwellings are near a new development	This will be addressed in the Location section.
There is a need for occupational dwellings.	This will be addressed in the Use section.
The housing should be for local residents	This will be addressed in the Use section.
The housing will help retain local entrepreneurs and professionals.	This will be addressed in the Use section.
There is a housing shortage in the country.	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

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
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
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 2 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 Fenland Local Plan (2014) identifies Doddington as being a 'Growth Village'. For these settlements, development and new service provision either within the existing urban area or as a small village extension will be appropriate albeit of a considerably more limited scale than that appropriate to the Market Towns.

- 10.2 Policy LP12 identifies that to receive support, the site must be in or adjacent to the existing developed footprint of the village, defined as the continuous built form of the village and excludes individual buildings and groups of dispersed, or intermittent buildings, that are clearly detached from the continuous built-up area of the settlement. The Local Plan does not rely on defined settlement boundaries but rather requires a physical assessment to be made to determine whether or not a site is within a village for the purposes of Policy LP12. This results in a situation where a site could be considered in general terms to be part of the village but not be in the village for the purposes of the spatial strategy. It is considered that the site is visibly separated from the edge of the built-up settlement of Doddington by approximately 1 km when travelled by road.
- 10.3 It is apparent, that in the case of the application site, it is clearly detached from the remainder of Doddington by agricultural fields and thus outside the continuous built form of the settlement. The majority of the surrounding area is agricultural in use and rural in nature. As such the proposal would constitute development in an 'Elsewhere' location as defined under LP3 which seeks to restrict that to essential rural based development. The proposal is therefore in conflict with Policies LP3 and LP12.
- 10.4 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.
- 10.5 The site comprises of approximately 0.52ha of Grade 3 Agricultural land as defined by DEFRA (Defra Spatial Data Download) and classified as very good.
- 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 Leam 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 0.52ha is not significant in the context of BMV land within Fenland.

- 10.9 The site and surrounding area is unlit and is not served by a footpath. However, 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.
- 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, have lit roads and are served by footpaths. The site the subject of this application is within open countryside, and no justification has been provided as to why workplace dwellings are essential in this unsustainable location. To allow workplace dwellings in this location would set a harmful development precedent that would urbanise an area of open countryside that is over 1 kilometre by road from the edge of the built up settlement of Doddington.
- 10.11 The site lies within Flood Zones 1, 2 and 3. Built development is shown 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. It is therefore considered that the proposal is not in accordance with Policy LP14 of the Fenland Local Plan, 2014, and Chapter 14 of the National Planning Policy Framework, 2024.
- 10.12 As per Policy LP3, development not falling into one of the categories set out in the settlement hierarchy will fall into the “elsewhere” category and will be restricted to that which is demonstrably essential to the effective operation of local agriculture, horticulture, forestry, outdoor recreation, transport or utility services or to minerals and waste development. Whilst the application is for two “occupational dwellings”, the application does not state that these are specifically in relation to any of the industries defined by Policy LP3. Development of this site would introduce a formal, linear extension into the open countryside, which does not respect the rural character. If this development was supported it would result in an unacceptable urbanisation to the detriment of the open countryside through the erosion the rural character of the locality. To allow unjustified residential development in this unsustainable location would set a precedent for future development, further eroding the open character of the area.

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. One letter of support states that the housing should be for local residents, however, there is no mechanism to secure this. Supporters also 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 two dwellings on a site of 0.52ha 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, it is difficult to make a direct comparison to other dwellings in the vicinity as they are low in number and do not contain workplace unit buildings. The detailed layout and design will be for consideration at the Technical details stage. In terms of consideration of amount, the proposal is acceptable.
- 10.17 An objection has been raised as to the 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 two 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 two 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. The only new dwelling approved in the vicinity of the site is for a dwelling of exceptional design under F/YR21/0015/F which accorded with local and national planning policy.

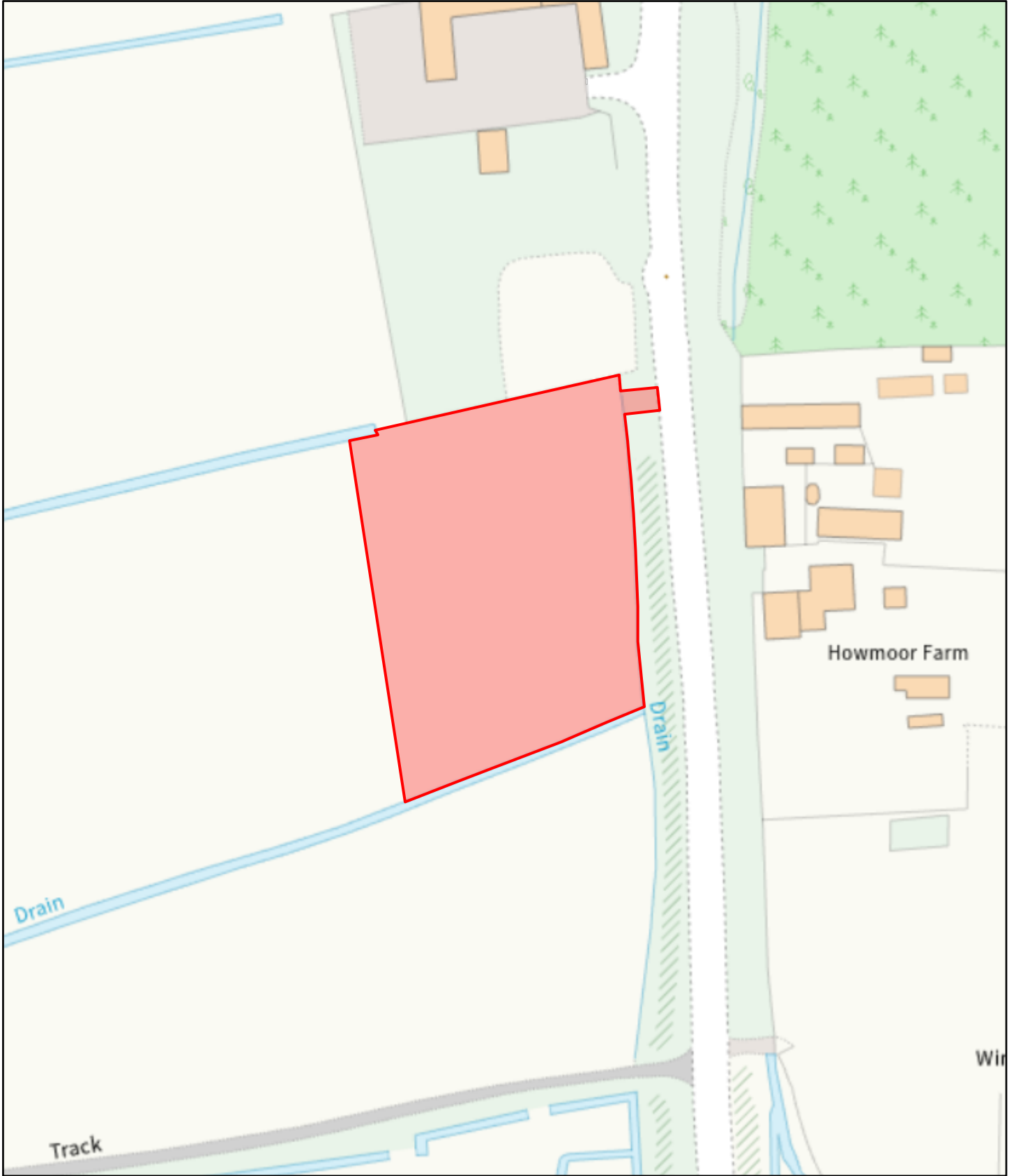
11 CONCLUSIONS

- 11.1 As indicated above it is only location, use and amount of development that may be considered at the first 'permission in principle stage' and it is considered that the location and use of the site for residential development is unacceptable due to the conflict with the settlement hierarchy of the Local Plan.
- 11.2 The principle of development is not supported as the site does not adjoin the built form and whilst the proposal is for workplace dwellings there is no planning justification for such a dwelling in this location.
- 11.3 The site is partially located in Flood Zone 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 As such the application is considered to be in conflict with both national and local policy and accordingly the recommendation is one of refusal.

12 RECOMMENDATION

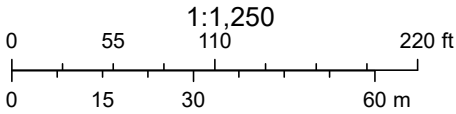
Refuse; Permission in Principle for the following reason:

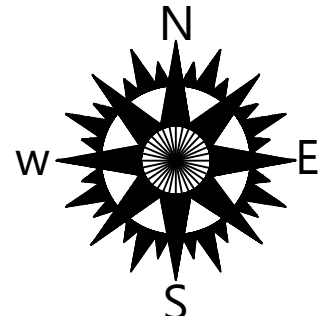
1.	The application site constitutes an area of land located outside the developed footprint of Doddington. Development of this site would result in an unacceptable urbanisation, extending development into the countryside. It would likely set a precedent for future development, further eroding the character 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	Policy LP14 (Part B) of the Local Plan requires development in Flood Zone 3 to undergo a sequential test to demonstrate that the development cannot be delivered elsewhere in the area at lower risk areas of flooding. Policy LP2 seeks to deliver high quality environments, ensuring that people are not put at identified risks from development thereby avoiding adverse impacts in the interests of health and wellbeing. The site lies within Flood Zone 3 which is a high risk flood area. The applicant has failed to undertake a substantive and evidenced sequential test and has therefore failed to demonstrate that the development could not be delivered in an area of lower flood risk, thereby failing LP14 (Part B). Consequently, the proposal fails to satisfy policy LP2 of the Fenland Local Plan as it fails to deliver a high quality environment and unjustifiably puts future occupants at higher risk of flooding.



10/8/2025, 2:47:55 PM

 Fenland District Boundary





1:250

5 10 15 20

All finishes, insulation and damp-proofing to architect's details

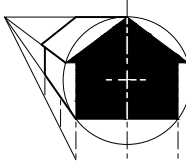



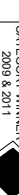
DRAWN MH	DATE OF ISSUE
CHECKED	
DATE July 2025	DRAWING NUMBER H10633/03
SCALE As Shown	

All products and materials to be handled, stored, prepared and used or fixed in accordance with the manufacturers current recommendations.

The contractor is to arrange inspections of the works by BCO (or NIBC) as required by the Building Regulations and to obtain completion certificate and forward to the Engineer.

All finishes, insulation and damp-proofing to architect's details



	REVISIONS	DATE
<h1>MORTON & HALL CONSULTING LIMITED</h1> <p>1 Gordon Avenue, March, Cambridgeshire, PE15 8AJ</p> <p>Tel: 01354 655454 Fax: 01354 660467 E-mail: info@mortonandhall.co.uk Website: www.mortonconsultingengineers.co.uk</p>		
 <p>LABC BUILDING EXCELLENCE AWARDS</p> <p>winner</p>	 <p>Fenland District Council</p>  <p>Building Design Awards Building Excellence in Fenland</p>	
CLIENT		
Savage Developments Ltd		
PROJECT		
Proposed Development South of 29 Primrose Hill Doddington Cambs PE15 0SU		
TITLE		
Indicative Proposed Site Plan		
DRAWN	MH	DATE OF ISSUE
CHECKED		
DATE	July 2025	DRAWING NUMBER
SCALE	As Shown	H10633/04