

**EAST CAMBRIDGESHIRE
LOCAL PLAN EXAMINATION**

**MATTER 16
SITE ALLOCATIONS -
MEDIUM VILLAGES**

**DUDLEY DEVELOPMENTS
ID: 983011**

WRITTEN STATEMENT

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1. INTRODUCTION

- 1.1 This Written Statement has been prepared by Carter Jonas LLP on behalf of Dudley Developments. Dudley Developments owns land south of Stetchworth Road in Dullingham which was assessed in the Site Assessment Evidence Report (Ref. Site/09/01). As set out in our representations to the Proposed Submission East Cambridgeshire Local Plan (ECLP), we object to the development strategy for Dullingham because it is based on a single small residential allocation and an 'infill' only approach which means that no new affordable housing will be delivered, limited funding derived from planning obligations for transport and community infrastructure, and less support for existing services and facilities in the village. The site at land south of Stetchworth Road in Dullingham could provide additional housing and affordable housing, and it is considered that this site should be identified as an additional allocation.

2. MATTER 16: SITE ALLOCATIONS – MEDIUM VILLAGES

Issue 1: Whether the proposed site allocations are justified, based on up-to-date evidence, effective, viable, deliverable and consistent with national policy?

Site Allocation: DUL.H1 Land off Kettlefields, Dullingham

Question 62. Taking each of the following proposed site allocations individually:

a) What is the background to the site allocation? How was it identified and which options were considered?

- 2.1 The site at land off Kettlefields in Dullingham is allocated for 15 dwellings – Site DUL.H1. The decision to allocate the site is based on the findings of the Site Assessment Evidence Report [Doc Ref. PE13] – see Site Ref. 09/03. The main findings and recommendations of the assessment for the site are that it is a ‘preferred site’ and *“The site provides a logical extension to Kettlefields with clear, defined boundaries and therefore relates well to Dullingham’s built form. The site is in close proximity to the primary school”*. It is noted that for most of the site assessment criteria the site scores A to C. It is considered that the topics where the site scores D and E are relatively minor issues and do not reflect whether these matters represent an actual constraint to development at the site. For example accessibility by walking to medical services, secondary schools and employment is typical for medium villages, and accessibility by cycling and public transport are equally important factors; Dullingham is one of the few settlements in East Cambridgeshire with a railway station, and it served by a number of bus routes. A site might be located in close proximity to Dullingham Conservation Area or a Listed Building within the village, but that does not mean that development at the site would be visible from or would have a significant impact on the setting of those heritage assets.
- 2.2 The site was not allocated at First Draft Local Plan stage in January 2017; no allocations were made in Dullingham at that stage. In the representations by Dudley Developments to the First Draft Local Plan consultation we objected to the lack of residential allocations in Dullingham because this approach would provide no support for existing services and facilities in the village, the required improvements to drainage infrastructure would not be funded, and no affordable housing would be delivered. It is considered that the proposed allocation at DUL.H1 will not address our previous concerns. As set out below, a larger allocation is needed in Dullingham to support services and facilities, fund improvements to infrastructure and deliver additional affordable housing within the village, and land south of Stetchworth Road in Dullingham is promoted for that purpose.
- 2.3 A range of potential development sites in Dullingham were assessed in the Site Assessment Evidence Report. However, we have two concerns with the outcome of the site selection process. Firstly, it is considered that the site capacity has been over-estimated, and a more realistic capacity assessment would fall below the affordable housing threshold. Secondly, the opportunity to support existing services and facilities, address drainage infrastructure constraints, and deliver affordable housing has not been taken into account during the site assessment process.
- 2.4 It is considered that the proposed number of dwellings for the site has been over-estimated. The proposed number of dwellings does not reflect the existing density and character of Kettlefields. All of the dwellings in Kettlefields are bungalows. The proposed development will need to include landscaping to address the relationship with the surrounding countryside and to provide a buffer with the neighbouring primary school. It is considered that the site could accommodate approximately 8 to 10 dwellings, once landscape and the character of the surrounding area have been taken into account.

c) What is the scale type/mix of uses proposed?

- 2.5 The proposed allocation is for 15 dwellings. It is considered that that the proposed number of dwellings for the site has been over-estimated. It is not clear whether bungalows are proposed at the site, which typically have a lower density; all of the dwellings in Kettlefields are bungalows. As set out above, the proposed number of

dwellings does not reflect the existing density and character of Kettlefields. It is considered that the site could accommodate approximately 8 to 10 dwellings.

- 2.6 If, as expected, the proposed development can only deliver 10 or less dwellings then it would fall below the threshold for providing affordable housing. There is a substantial need for affordable housing across East Cambridgeshire.
- 2.7 There have been very few 'infill' (or any other) residential developments in Dullingham in recent years, which in part will be because most of the village is covered by a Conservation Area and a Historic Park & Garden. The lack of applications for residential development in Dullingham means that no new affordable housing will have been delivered. The proposed allocation at DUL.H1 does not seek to address the lack of delivery of affordable housing in Dullingham in the past, and means that no affordable housing will be provided in the village during the plan period. The proposed development strategy for Dullingham will not meet housing or affordable housing needs in the village, and as such is not consistent with national guidance.

d) What is the basis for this and is it justified?

- 2.8 The quantum of development assumed at the proposed allocation is based on applying a standard density calculation. The quantum of development is not justified because it takes no account of the character of the surrounding area, the need for landscaping within the proposed development, or the fact that all of the dwellings in Kettlefields are bungalows. It is requested that a more realistic assessment of site capacity is undertaken.

f) What are the benefits that the proposed development would bring?

- 2.9 The proposed development would provide additional housing in Dullingham, which is a benefit. However, it is unlikely that the proposed development would provide any affordable housing because it is expected that the site capacity will fall below the 11 dwelling threshold. In addition, the proposed development will make no or limited contribution towards improvements to drainage infrastructure, pedestrian/cycle improvements and improvements to the sports pavilion, and will provide limited support to existing services and facilities within the village.

h) What are the potential adverse impacts of developing the sites, including to heritage assets? How could they be mitigated?

- 2.10 The site assessment identified no significant constraints to development at the site. It is noted that the site scored D because it is within 500m of the Conservation Area and Listed Buildings. The site might be located in close proximity to Dullingham Conservation Area and Listed Buildings within the village, but that does not necessarily mean that development at the site would be visible from or would have a significant impact on the setting of those heritage assets. The presence of heritage assets in a village should not prevent the delivery of development that does not affect those assets, and this approach applies to other potential development sites.

Additional Site: Land south of Stetchworth Road, Dullingham (Site Ref. Site/09/01)

- 2.11 It is considered that an additional allocation is needed in Dullingham for the following reasons. The proposed allocation at DUL.H1 will not provide affordable housing once a realistic assessment of site capacity has been undertaken. An 'infill' housing strategy for Dullingham will also deliver no affordable housing in the village. We understand that the Parish Council has an aspiration for affordable housing for local people to be provided within the village. However, it is expected that no affordable housing will be delivered in Dullingham during the plan period. The limited amount of residential development that has occurred in Dullingham in recent years has also delivered no affordable housing. Policy Dullingham 3 identifies a number of community and infrastructure items needed in Dullingham. A development strategy based on a single small allocation and an 'infill' only policy will make no or limited contribution towards improvements to drainage infrastructure, pedestrian/cycle improvements and improvements to the sports pavilion. The development strategy for Dullingham will also provide limited support to existing services and facilities within the village. As set out in the representations submitted on behalf of Dudley Developments, it is considered that the development strategy for Dullingham, comprising a single allocation and an 'infill' only policy, is not positively prepared and is not consistent with national policy and is therefore unsound.

- 2.12 Furthermore, following the outcome of the Stage 1 of the Examination, it is requested that additional allocations should be made to meet the identified housing shortfall arising from the Inspector's interim conclusion that transferring 1,125 dwellings from East Cambridgeshire to Peterborough represents an unsound approach. The housing shortfall is addressed in more detail in the Matter 17 Hearing Statement.
- 2.13 In our representations to Policy Dullingham 3 it was requested that an additional allocation is made at land south of Stetchworth Road in Dullingham. The site was assessed in the Site Assessment Evidence Report (Ref. Site/09/01), and was subject to consultation. The representations to Policy Dullingham 3 commented on the findings of the site assessment, and in particular those topics where amendments to the findings of the assessment are required e.g. accessibility, school capacity and impact on heritage assets.
- 2.14 It appears that one of the reasons why the land south of Stetchworth Road was not selected as a preferred site was because historically development has occurred on the north side of the road. We consider that this is not a valid approach for the growth of Dullingham because realistic options for development on the north side of the road are limited without causing adverse impacts on the setting of the Conservation Area, Listed Buildings and Historic Park & Gardens. It would be preferable to locate additional development on sites which avoid adverse impacts on heritage assets, and land south of Stetchworth Road is a suitable option within close proximity of the village.
- 2.15 We wish to reiterate the information provided in representations to clarify the scope, form and potential of development at our client's site and set these out below.
- 2.16 The site is promoted for a mixed development comprising market housing and community-led housing scheme for local people. The delivery of a proportion of market housing could fund improvements to the drainage infrastructure and community facilities through planning obligations, which are matters that the Parish Council has identified as priorities.
- 2.17 We expect that the design and layout of the proposed development at the site to reflect the existing character of the village. The existing mature hedgerows and landscaping at the site boundary would be retained and where appropriate enhanced. We anticipate that a cul-de-sac form of layout would be appropriate and consistent with residential areas to the north of Stetchworth Road. The proposed development would include generous setbacks and areas for landscape to the west and south also to buffer the footpaths and help "green" the edges. The proposed development will include drainage features to address existing surface water flooding in Dullingham. A landscape strategy will be required, including strategic landscaping on the southern and eastern boundary of the site, to address visual impact associated with the proposed development and to maintain separation between Dullingham and Stetchworth.
- 2.18 The site is 3.75 Ha in size. The quantum of development, the amount of land for community uses, and the layout of the proposed development are not fixed at this stage. It is suggested that the site could accommodate 50 dwellings and that half of the site would be occupied by open space and community uses. It is suggested that an appropriate distribution of uses across the site is as follows: western part for an extension to the existing recreation area; middle section for dwellings, with vehicular access off Stetchworth Road; eastern part for open space and green infrastructure; and landscaping on the southern and eastern boundary to address visual impact and maintain separation with Stetchworth.
- 2.19 It is requested that an additional allocation is added to Policy Dullingham 3, and that land south of Stetchworth Road in Dullingham is allocated for approximately 50 dwellings.

