



EAST CAMBRIDGESHIRE
DISTRICT COUNCIL

East Cambridgeshire Local Plan – Single Issue Review (SIR) Proposed Submission Stage Response Form

PLEASE USE BLACK INK TO COMPLETE THIS FORM
Please refer to 'Guidance notes on completing the Representation Form'

From 3 May to 13 June 2022, you can make representations on the soundness and legal compliance of the proposed submission Single Issue Review of the Local Plan. **All comments must be received by 11:59pm on 13 June 2022.** Responses made at this stage will be treated as formal representations and considered by an independent Planning Inspector: late submissions are unlikely to be considered by the Inspector.

Where possible, we prefer you to use this form when submitting your comments. This allows you to type your comments next to the policy or paragraph that you want to comment on. If you need any help in completing this form, please read the guidance note available on our website which explains how to make comments and how any comments will be dealt with. Please send your completed form either via email or through the post.

PART A: YOUR DETAILS

Data Protection and Freedom of Information All personal information that you provide will be used solely for the purpose of the consultation on the documents listed in this form. Please note that each comment and the name of the person who made the comment will be featured on our website - comments will not be confidential. Full comments, including addresses, will also be available to view on request. By submitting this response, you are agreeing to these conditions.	
Name: Dudley Developments	Agent (if applicable): Carter Jonas LLP
Organisation (if applicable):	Name: Brian Flynn
Address: c/o Agent	Address: Carter Jonas LLP One Station Square Cambridge
Postcode:	Postcode: CB1 2GA
Email:	Email: [REDACTED]
Tel:	Tel: [REDACTED]
Signature: Carter Jonas on behalf of Dudley Developments	
Date: 13/06/22	

We will send all correspondence by email if you provide us with your email address. If Agent details are provided, we will send all correspondence to them.

Do you wish to be notified of any of the following? (Please tick as appropriate)

The Submission of the Local Plan for independent examination:
The Publication of the Inspector's Report:
The Adoption of the Local Plan:

<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and any suggested change. **After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies**

If you need assistance please call 01353 665555

**Please email completed forms to planningpolicy@eastcambs.gov.uk or post to:
Local Plan Consultation, East Cambridgeshire District Council, The Grange, Nutholt Lane, Ely, Cambs CB7**

East Cambridgeshire Local Plan – Single Issue Review (SIR)



EAST CAMBRIDGESHIRE
DISTRICT COUNCIL

for examination.

PART B: QUESTIONS

ONE FORM SHOULD BE COMPLETED FOR EACH REPRESENTATION

Q1. To which part of the SIR Local Plan or Sustainability Appraisal (SA) does this representation relate?

Sustainability Appraisal Table 5 and Appendix B

Q2. Do you consider the following to be legally compliant?

SIR Local Plan	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Don't know <input type="checkbox"/>
Sustainability Appraisal (SA)	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Don't know <input type="checkbox"/>

Q3. Do you consider the SIR Local Plan is:

Positively Prepared	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Don't know <input type="checkbox"/>
Justified	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Don't know <input type="checkbox"/>
Effective	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Don't know <input type="checkbox"/>
Consistent with national policy	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Don't know <input type="checkbox"/>
In compliance with the Duty to Co-Operate	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Don't know <input type="checkbox"/>

Q4. If you answered 'No' to question 2 or 3 above, please give details below. Please be as precise as possible and follow guidance in our note 'Guidance notes on completing the Representation Form'. You can also use this box to set out your representation if you support the SIR Local Plan or SA.

Table 5 and Appendix B of the Sustainability Appraisal (SA) contain the assessment of the amendments and options for Policy GROWTH 1 against the defined sustainability objectives. Option 1 for the amendments to Policy GROWTH 1 is a housing requirement derived from the standard method contained in national guidance, with no new allocations or additional growth. It is noted that the assessment for Option 1 identifies a neutral outcome for all sustainability objectives. It is considered that a neutral score for sustainability objectives represents an unsatisfactory outcome and action should have been taken to seek improvements. It is also considered that the neutral score for community and housing related sustainability objectives is not robust or correct, because affordable and older person housing needs would not be met and previously identified community and infrastructure facilities would not be delivered by SIR. These representations comment on the findings of the assessment for Option 1 against the following SA objectives: 6.1 (improving access to services and facilities); and 6.3 (access to affordable housing).

A key aim of the SA process is to make a plan more sustainable. It tests the social, economic and environmental impacts of various plan options, to help choose the most sustainable options. It also seeks to determine the extent to which the principles of sustainable development are integrated into the plan and its policies.

The requirements for Strategic Environmental Assessment are contained in the SEA Directive (2001/42/EC) and the Environmental Assessment of Plans and Programmes Regulations 2004. Paragraph 14 of the SEA Directive expects an environmental report to identify, describe and evaluate the likely significant environmental effects of implementing the plan and reasonable alternatives. Paragraph 6 of Schedule 2 of the Environmental Assessment of Plans and Programmes Regulations 2004 sets out the information to be included in environmental reports, and expects the likely significant effects on the environment to be assessed.

Table 3 of the SA for SIR identifies each of the sustainability objectives and the key questions for the assessment process. Table 4 identifies the scoring system for the assessment process. The community and housing related sustainability objectives that are relevant to these representations are as follows:

- **SA Objective 6.1 Improve the quality, range and accessibility of services and facilities (e.g. health, transport, education, training, leisure opportunities)**

- Will it improve accessibility to key local services and facilities?
 - Will it improve accessibility by means other than the car?
- SA Objective 6.3 Ensure all groups have access to decent, appropriate and affordable housing
 - Will it support the provision of a range of housing types and sizes to meet the identified needs of all sectors of the community?

It is concluded in Table 5 of the SA that there would be a neutral outcome for Option 1 when assessed against these three SA objectives. It is concluded in the detailed assessment within Appendix B of the SA that Option 1 is not relevant to SA Objective 6.1 and there would be a neutral outcome, and for SA Objective 6.3 there would be a neutral outcome with no material effect on growth levels or sites allocated for development. A neutral score for these community and housing related sustainability objectives clearly represents an unsatisfactory outcome, but the SA process does not recommend any action to improve the outcomes for these sustainability objectives, and as such it has failed to make the SIR more sustainable. In any event, as set out below, the neutral effects identified for the community and housing related sustainability objectives are not appropriate or robust, and should be amended from neutral effects to adverse or significant adverse effects.

In respect of SA Objective 6.1, it is noted that the withdrawn 2017 East Cambridgeshire Local Plan identified a number of infrastructure improvements e.g. schools, community facilities, health facilities, drainage, walking and cycling links, and open space etc. which were to be delivered and funded in conjunction with development. The infrastructure improvements that were identified for Dullingham included the following: capacity of the main sewer; pedestrian and cycle routes; cycle safety and cycle link to Newmarket; and to sports pavilion. It is likely that despite the withdrawal of the 2017 document the need for those facilities still exists, but it is not clear whether those previously identified infrastructure improvements will actually be delivered in the absence of additional allocations at Dullingham. Dudley Developments owns land off Stetchworth Road in Dullingham, adjacent to the sports pitches and facilities in the village. A development for residential development at this site could contribute towards the previously identified infrastructure improvements and improvements to the sports pavilion. The non-delivery of previously identified infrastructure improvements for Dullingham should have informed the assessment of Option 1 against SA Objective 6.1. If, as expected, the previously identified improvements to capacity in the main sewer, pedestrian and cycle infrastructure, and sports facilities for Dullingham would not be delivered as a result of the SIR, then SA Objective 6.1 would not be achieved i.e. access to sports facilities would not be improved, and accessibility by sustainable modes of transport would not be improved. It is requested that Option 1 of SIR is reassessed against SA Objectives 6.1 to take into account the non-delivery of previously identified infrastructure improvements for Dullingham identified in 2017, with Tables 5 and Appendix B in the SA updated accordingly. It is suggested that the score for Option 1 of SIR against SA Objective 6.1 should be amended from 'neutral effect' to '- adverse effect'. A more appropriate 'adverse effect' score for SA Objective 6.1 should have resulted in a recommendation in the SA that an alternative or revised option was selected for SIR, which delivered better and more positive outcomes for the community related sustainability objectives.

There are two matters that have not been taken into account in the assessment of Option 1 for SA Objective 6.3, which are affordable housing and housing for older people. There is recent evidence on both these matters that could and should have informed the SA process and resulted in amendments to replacement Policy GROWTH 1 in order to achieve better housing related sustainability outcomes.

Firstly, it is noted in the latest monitoring information (Authority Monitoring Report for 2020/2021 (published in December 2021) that the delivery of affordable housing in East Cambridgeshire continues to be poor – see Table 6 in AMR and attached to the Section 4 representations. There are no years since the start of the plan period in 2011 when overall policy requirements for affordable housing have been achieved. The Bottisham appeal decision (Appeal Ref: APP/V0510/W/21/3282241) – attached with the representations to Section 2 – referred to affordable housing in East Cambridgeshire. Paragraphs 58 and 59 of the appeal decision highlight the affordable housing needs and delivery in East Cambridgeshire, and identifies a significant need for affordable housing, poor delivery of affordable housing that has led to a significant shortfall, and persistent under-delivery of affordable housing during the last 10 years. As highlighted in Paragraph 58 of the appeal decision, there is a shortfall in the delivery of affordable housing between 2011 and 2021 of 1, 281 dwellings. It is clear from annual monitoring and the Bottisham appeal decision that adopted Policy GROWTH 1 has not delivered sufficient affordable housing to meet identified needs, and there is no evidence provided with the SIR that replacement Policy GROWTH 1 would address the current affordable housing shortfall and future affordable housing needs during the remainder of the plan period. In addition, according to the Council's Housing Register there

are currently 9 households with a local connection to Dullingham with an affordable housing need, which would not be addressed through the SIR and is ignored in the assessment for SA Objective 6.3. Dudley Developments owns land off Stetchworth Road in Dullingham that could provide a proportion of affordable dwellings to meet the current identified needs. It is considered that the significant need for affordable housing, the shortfall in affordable housing delivery, and the likelihood that affordable housing needs including for Dullingham would not be met during the plan period are factors that should have been taken into account in the assessment of Option 1 against the housing related sustainability objective of SA Objective 6.3.

Secondly, the Bottisham appeal decision also considered the need for older person housing in East Cambridgeshire. Paragraphs 62 and 63 of the appeal decision identify the needs for older person housing and extra care accommodation in East Cambridgeshire, and at Paragraph 66 the Inspector concluded that the needs for both types of housing were acute and growing. It is noted in Paragraph 68 of the appeal decision that there are no applications, no site allocations, and no predicted completions in the next five years for extra care accommodation in East Cambridgeshire, and that the general housing site allocations cannot be relied upon to provide extra care accommodation. The Bottisham appeal provides a recent assessment of the needs for housing for older people and for extra care accommodation, and concluded that those needs are not being met by policies in the adopted East Cambridgeshire Local Plan including adopted Policy GROWTH 1. There is no evidence provided with the SIR that replacement Policy GROWTH 1 would meet the identified needs for housing for older people and for extra care accommodation during the plan period. It is considered that the unmet needs for housing for older people and for extra care accommodation are factors that should have been taken into account in the assessment of Option 1 against the housing related sustainability objective of SA Objective 6.3.

It is requested that Option 1 of SIR is reassessed against SA Objectives 6.3 to take into account the significant need for affordable housing, the shortfall in affordable housing delivery, the likelihood that affordable housing needs would not be met during the plan period, and unmet needs for housing for older people and for extra care accommodation that are not addressed in replacement Policy GROWTH 1, with Tables 5 and Appendix B in the SA updated accordingly. It is suggested that the score for Option 1 of SIR against SA Objectives 6.3 should be amended from 'neutral effect' to '—significant adverse effect'. A more appropriate and robust 'significant adverse effect' score for SA Objective 6.3 should have resulted in a recommendation in the SA that an alternative or revised option was selected for SIR, which delivered better and more positive outcomes for the housing related sustainability objectives.

- Q5. If you answered 'No' to question 2 or 3 above, please set out what change(s) you consider necessary, and why, to make the SIR Local Plan or SA legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text. Please be as precise as possible.

It is requested that the assessment for Option 1 in Table 5 and Appendix B in the SA are amended as follows:

- It is requested that Option 1 of SIR is reassessed against SA Objective 6.1 to take into account the non-delivery of previously identified infrastructure improvements for Dullingham identified in 2017, with Tables 5 and Appendix B in the SA updated accordingly. It is suggested that the score for Option 1 of SIR against SA Objective 6.1 should be amended from 'neutral effect' to '- adverse effect'. A more appropriate 'adverse effect' score for SA Objective 6.1 should have resulted in a recommendation in the SA that an alternative or revised option was selected for SIR, which delivered better and more positive outcomes for the community related sustainability objectives.

Q6. It is important to note that written and oral representations carry exactly the same weight and will be given equal consideration in the examination. As such, do you consider it necessary to participate at the oral part of the examination?

Yes I do wish to participate at the oral examination

THANK YOU FOR TAKING TIME TO RESPOND

If you need assistance please call 01353 665555

Please email forms to: planningpolicy@eastcambs.gov.uk
Or post to: Local Plan Consultation, East Cambridgeshire District Council, The Grange, Nutholt Lane, Ely, Cambs CB7 4EE

(Office only) Ref:.....