MATTER 1. - SUSTAINABILITY APPRAISAL

1.2 – Is the Sustainability Appraisal Adequate?

I would strongly contend that the SA is not adequate specifically in its identification and allocation of Site 62 (SCLP12.50) for housing development for the reasons amplified in 1.3 and 1.4 below.

1.3 – Has the SA been undertaken on the basis of consistent methodology and is it robust?

1.3.1 I highlighted in my representations dated 5th February 2019 on the Final Draft Local Plan, Site 62 was incorrectly assessed in the original SHELAA and therefore should not have been brought forward as the Preferred Option in Dennington.

However, having done so, these errors were compounded by incorrect and inconsistent evaluations of the effects of development of Site 62 against the Council’s Sustainability Objectives on pages 586-588 of the SA for the following detailed reasons:

<table>
<thead>
<tr>
<th>No.</th>
<th>Effect</th>
<th>Reason</th>
</tr>
</thead>
<tbody>
<tr>
<td>3</td>
<td>Evaluation should have been 0 not?</td>
<td>Limited access to local health facilities will continue</td>
</tr>
<tr>
<td>6</td>
<td>Evaluation should have been – not +</td>
<td>Identified flood risk and will increase pressure on water resources</td>
</tr>
<tr>
<td>7</td>
<td>Evaluation should have been - not –</td>
<td>Will definitely harm air quality through increased emissions</td>
</tr>
<tr>
<td>11</td>
<td>Evaluation should have been – not +</td>
<td>Potential to increase flood risk</td>
</tr>
<tr>
<td>13</td>
<td>Evaluation should have been – not +</td>
<td>Bats have been recorded on the site</td>
</tr>
<tr>
<td>14</td>
<td>Evaluation should have been – not +</td>
<td>Grade II listed buildings are 30m closer to site than stated and development will have detrimental to their setting and the Conservation Area</td>
</tr>
<tr>
<td>15</td>
<td>Evaluation should have been - not +</td>
<td>Development will cause great harm to the quality and distinctiveness of the local landscape and traditional rural village character</td>
</tr>
<tr>
<td>17</td>
<td>Evaluation should have been – not 0</td>
<td>Housing development should be within towns not small villages – will tend to encourage online shopping to the detriment of retail centres</td>
</tr>
<tr>
<td>18</td>
<td>Evaluation should have been - not +</td>
<td>In May 2019 further reduction in already minimal local bus services was announced necessitating car...</td>
</tr>
</tbody>
</table>
1.3.2. Had the evaluation been undertaken correctly a cumulative negative score of -11 would have resulted compared with current positive +4/5. The SA is therefore not robust.

1.3.3. The SA is also inconsistent in its evaluation of the Alternative Site Option: 860 Land Adjacent to Bardolph Cottages, Saxtead Road, Dennington on pages 1089-91. I would highlight the following discrepancies when compared with the evaluation of Site 62:

<table>
<thead>
<tr>
<th>No.</th>
<th>Effect</th>
<th>Reason</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.</td>
<td>Evaluation + in comparison with ++</td>
<td>No reason why affordable housing and mix of dwelling types could not be included in development</td>
</tr>
<tr>
<td>6.</td>
<td>Evaluation 0 in comparison with +</td>
<td>Smaller development would actually have less effect</td>
</tr>
<tr>
<td>11.</td>
<td>Evaluation – in comparison with +</td>
<td>When both sites have identified flooding issues</td>
</tr>
<tr>
<td>14.</td>
<td>Evaluation -? In comparison with +?</td>
<td>When site 860 is much further removed from village Conservation Area</td>
</tr>
<tr>
<td>15.</td>
<td>Evaluation 0 in comparison with +</td>
<td>When it would actually have less effect on local distinctiveness</td>
</tr>
</tbody>
</table>

1.3.4. In summary, an accurate evaluation of the respective sites would show that development of the Alternative Site 860 would score less negatively on Sustainability criteria than Site 62. The methodology used is inconsistent and the SA is therefore not robust.

1.4 – Has the SA taken into account reasonable alternatives and has sufficient reasoning been given for the rejection of alternatives?

As I stated in paragraph 1.5 of my written representations on the Final Draft other sites could be available in Dennington to satisfy identified local housing need and their merits do not appear to have been properly assessed during the Local Plan process.

In respect of Alternative Site 860 on page 174 the only reason given for preferring Site 62 and rejecting Site 860 is: ‘it was deemed Site 62 a more suitable site due to proximity to the school and the potential for wider benefits.’

Since the school is within 5 minutes walking distance of Site 860 and as highlighted above it has less negative effects on achieving sustainability objectives I do not believe sufficient sound reasons have been given for the rejection of possible alternative sites.

COMMUNITY INVOLVEMENT

1.8 - Has the Council complied with the requirements of section 19(3) of the 2004 Act with regard to conducting consultation in accordance with the Statement of Community Involvement?

When the Council published the First Draft of the Local Plan in July 2018 it was not adequately publicised within Dennington. On 23rd July a depleted meeting of the local Parish Council decided not to make any representations nor undertake any village consultation despite the very significant new proposal to allocate land outside the Settlement Boundary for a 50 dwellings development.

I highlighted my concerns in paragraph 6 of my written representations on the Final Draft and believe that the Council should have ensured that the residents of Dennington were made fully
aware of the specific policy proposal for this site at the outset of the Local Plan public consultation process.

MATTER 3: AREA SPECIFIC STRATEGIES – DEVELOPMENT ALLOCATIONS

Policy SCLP12.50 Land off Laxfield Road DENNINGTON

My responses to the general questions raised by the Inspector are as follows:

1. Is the proposed Area Specific Strategy, allocation and policy justified, effective and consistent with national policy?

   For the reasons set out in detail in my written representations dated 5th February 2019 this Development Allocation is not justified nor is it consistent with national policy. In summary:

   1.1 The need for an additional allocation of more than 2.5 hectares of land for housing in Dennington is not demonstrated;
   1.2 The Council’s Suitability and Sustainability Appraisals of Site 62 are flawed and are inconsistent with national policy; and
   1.3 This Policy is in direct conflict with national planning policy towards protecting Historic Landscape and Heritage Assets.

2. Is the site allocation and its criteria justified and appropriate in all aspects, having regard to the likely impacts of the development and potential constraints?

   I contend that this site allocation, both in principle and scale, is not appropriate as its development will have the following harmful local impacts:

   2.1 Development of the site for some 50 dwellings in a Small Village with minimal public transport services will promote an unsustainable reliance on the private car, contrary to national policy
   2.2 Development of this greenfield site will result in the loss of high-quality Grade 2 agricultural land
   2.3 The site has an identified flooding risk
   2.4 Development will cause harm to local biodiversity
   2.5 The site is located outside the existing Settlement Boundary of Dennington and its proposed incorporation will destroy the traditional built boundary of the village and its historic field patterns. The type of estate housing development proposed is completely alien to the current linear built form of the village
   2.6 Development of the site is in direct conflict with what the Local Plan states at paragraph 12.542 is ‘the quiet rural character and the historic feel and the back-water qualities of the rural area’
   2.7 The policy does not take proper account of the harm which will be caused to the local Conservation Area and adjoining Grade 2 listed properties
   2.8 Development will put additional strain on local educational and medical facilities which are already at capacity – see paragraphs 12.552, 12.553 and 12.554 in Local Plan
3. Are there any significant factors that indicate the site should not be allocated? Is there a risk that site conditions, infrastructure or access requirements or constraints, might prevent development or adversely affect viability and delivery?

The Council have not demonstrated why Dennington, designated in the Local Plan as a Small Village, should have a disproportionately large housing allocation on a single site. Well planned organic growth over the Local Plan period can be accommodated by reverting to the original Site Allocation SSP8 for 10 dwellings restricted to Laxfield Road and further smaller scale infill developments.

My responses to the site-specific questions raised by the Inspector are as follows:

3.64 Is the provision of approximately 50 dwellings at the site justified given the size of the site and the proposed policy requirements?

Not justified since SHELAA suggests 15 dwellings per hectare in rural areas which equates to a potential allocation of up to 30 dwellings on the site not the 50 promoted in Policy SCLP 12.50. This figure appears to be a completely arbitrary one.

Paragraph 3.39 of the Draft Local Plan states that total allocations for housing exceed SCDC’s dwelling requirement for 2018-2036 by 8.5% (890 dwellings) before an allowance for windfall (50 expected per year from 2020) and small sites is made. The 40 additional dwellings proposed for Dennington are therefore not required to meet SCDC’s housing target. The housing allocation is therefore not justified.

3.65 Is the provision of dwellings designed to meet the needs of the older population justified?

I have not seen any evidence to support this provision.

3.66 Is the provision for specified areas for future school expansion and drop off point and new early years setting justified and if so, should they be specifically identified/safeguarded on the Policies Map?

Yes, they are justified to take account of potential future needs and safety considerations and should definitely be safeguarded.