

31 July 2023
CAPL497992/PR



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Dear Sirs,

East Cambridgeshire Local Plan – Single Issue Review (of its 2015 Local Plan)

Savills (Cambridge Planning) is instructed on behalf of Bellway Homes Limited to make representations in response to the Proposed Modifications consultation to the Single Issue Review (SIR) being undertaken by East Cambridgeshire District Council. Along with other interested parties we wrote to the Council at the Reg.18 stage of consultation to express the view that the approach being taken, in terms of the narrow focus of the SIR was unsound. We attended the round table session to discuss the Second Consultation Report (March 2022) and followed the subsequent correspondence between the Inspector and the Council which, to our minds displayed the Inspector's sympathy for the arguments we and others had presented. Nonetheless, the Council has chosen not to accept the arguments put forward for the adoption of a more comprehensive review. For the purposes of this consultation, I have to make clear that the points I set out in my letters of 3rd February and 24th May remain for consideration by the examining Inspector.

We remain concerned that the Council has chosen not to take the opportunity to look more widely at opportunities to increase the delivery of homes and the infrastructure that new residents depend on until a future date. In particular, my clients are concerned that the SIR is too narrow and that, by isolating the need to update the basis for calculating housing need, it has failed to address the current evidence of under-delivery. In this way it fails to be the aspirational and deliverable plan advocated by NPPF para 16(b). Instead it aims to cement a rate of growth and spatial delivery pattern for the remaining years of the current plan without contemplating the infrastructure needed by the community now or frontloading this for the future needs of the community beyond 2031.

There is no evidence of anything having happened or having been put in place to encourage a doubling of the delivery rate. The Council has provided no evidential basis for this confidence which

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is nevertheless of crucial importance to the decision to continue with the current narrow focussed approach.

The Council has proposed no changes to any existing policies which might encourage accelerated delivery of new homes to the required rate and neither has it proposed to allocate any additional sites. No changes are proposed that would alter the prospects for bringing forward exception sites. It is clear from the Council's published responses to date that a wider review would be unpalatable to the Council at this time and this is over-riding the common sense case for reviewing the whole Local Plan, as one would have expected having regard to the views expressed by the Soham Inspector who concluded that Growth 2 and Growth 4 are also out of date.

Whilst the Inspector has gone to great lengths to find an expedient way to respond positively to the SIR it is difficult to see how he can be satisfied that this will make the long-term strategy of the Local Plan any more reliable when it comes to housing delivery.

In summary, our client remains opposed to the approach being taken by the Council which will continue to fail to deliver at the required rate and will instead, defer meeting the needs identified for growth and the infrastructure needs of the current communities until the next decade.

Yours sincerely

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Paul Rowland DipEnvP MRTPI
Director