

Strategic Planning Team,
East Cambridgeshire District Council,
The Grange,
Nuthold Lane,
Ely,
CB7 4EE.

Registered Office:
Gladman House
Congleton Business Park
Alexandria Way
Congleton
Cheshire
United Kingdom
CW12 1LB

By email: planningpolicy@eastcambs.gov.uk

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By Email Only

Re: East Cambridgeshire Local Plan Single Issue Review Proposed Modifications Consultation

- 1.1 These representations provide the response of Gladman Developments Ltd (hereafter referred to as “Gladman”) to the consultation for the Proposed Modifications to the East Cambridgeshire Single Issue Review (SIR) Local Plan. Gladman has been involved throughout the preparation of the Plan having submitted detailed representations to each of the previous stages of consultation and having been a participant at the hearing sessions during the Examination in Public.
- 1.2 At each stage of the SIR preparation and examination process Gladman have outlined concerns regarding the soundness of the SIR and inconsistency with national planning policy, particularly in relation to the plan period not covering a 15-year period from adoption and the application of the standard method alongside implications on housing delivery in the district. Although it has been considered that it is outside of the scope for the examination, Gladman also considers that SIR proposals will have wider implications on the East Cambridgeshire Local Plan policies.
- 1.3 Following the progression of the examination including correspondence from the Inspector and the Proposed Modifications consultation, Gladman have sought Counsel advice alongside the LPDF and L&Q Estates to further understand whether the SIR meets the tests of soundness within the NPPF and PPG.



- 1.4 The submission, appended to this submission, supports the above considerations and states in conclusion:

“It follows that, the Council’s approach to their housing requirement is either contrary to paragraph 22 of the NPPF, insofar as GROWTH 1 will now no longer have a 15 year period from adoption or, GROWTH 1 will retain its existing plan period, but the policy will be deviated from insofar as the standard method has not been applied across the plan period and no exceptional circumstances have been provided to justify such an approach.”

Conclusion

- 1.5 Gladman reiterate that the SIR does not deliver a positively prepared, effective or consistent with national policy strategy that have significant flaws.
- 1.6 Although a proactive approach is required to deliver a framework for decision making purposes in the district, the Council should commit to an immediate full review of the Local Plan to provide a strategic, comprehensive planning vision and framework. The SIR is contrary to key elements of the NPPF, namely paragraphs 22 and 61, and cannot be considered to meet the tests of soundness.

Yours faithfully,

Josh Plant

Josh Plant

Senior Promotion and Policy Planner

