



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: Suzanne Nugent	Agent (if applicable):
Organisation (if applicable) : Cheffins Planning	Name:
Address: 76 Broad Street, Ely	Address:
Postcode: CB7 4BE	Postcode:
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Tel: [REDACTED]	Tel:
Signature: Suzanne Nugent	Date: 12.06.22

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:	<input type="checkbox"/>	Yes
The Publication of the Inspector's Report:	<input type="checkbox"/>	Yes
The Adoption of the Local Plan:	<input type="checkbox"/>	Yes

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 4EE



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?

Paragraph	<input type="text" value="2.4"/>	Policy	<input type="text"/>	SA	<input type="text"/>
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Q2. Do you consider the following to be legally compliant?

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

It is noted that within paragraph 2.4 the Council states that they are not seeking any representations as to whether the Council is correct to proceed on the basis of selecting Option 1 which is to "Do as the Review in April 2020 concluded, and limit any update of the Local Plan to the matters identified in the Review, namely GROWTH1 and its housing requirement, and possibly, consequentially, other policies if strictly necessary;"

PlanSurv Ltd (now Cheffins Inc PlanSurv Ltd) previously commented that a full local plan review should be undertaken and firmly believe that this is still required and this is further strengthened by the Inspector's findings in the appeal at Broad, Piece, Soham APP/V0510/W/21/3282449 which found that:

"The past shortfalls in delivery against the plan requirement are indicative that the allocations are not meeting housing needs and may be insufficient."

Without a whole plan review and full understanding of why delivery in the district is slow, the housing requirement is not going to be met, therefore updating the housing requirement only as proposed by this Single Issue Review of Policy GROWTH 1 is not addressing the issue of under-delivery; for this reason the Review is unsound as it not effective to take one policy in isolation when other policies have also been found to be out of date as part of appeal APP/V0510/W/21/3282449, these being policies GROWTH 2 and GROWTH 4. In examining whether policy GROWTH 2 is out of date the Inspector finds that:

"Whilst there is no dispute that for the purposes of calculating housing land supply, the standard method should now be used and that this seeks to address past shortfalls, that does not make the hefty shortfalls against the ECLP requirement immaterial. It is, in my view, an important indication that the ECLP has not been effective in meeting housing needs since the beginning of the plan period and casts further doubt as to whether the Council's locational strategy can be relied upon to significantly boost housing delivery in line with the National Planning Policy Framework (the Framework)."

This demonstrates that whilst the Inspector agrees that the standard method should now be used and therefore

THANK YOU FOR TAKING TIME TO RESPOND

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(Office only) Ref:.....



the housing requirement needs updating, this does not address the questions raised in terms of addressing the past shortfalls in delivery which requires a whole plan review; for this reason, we consider this Single-Issue Review to be ineffective and as such unsound.

(Continue on a separate sheet if necessary)

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.

The need for a whole plan review cannot be addressed by the SIR, but the SIR should at least acknowledge that reviewing the locational strategy and site allocations and addressing issues of under delivery will be required imminently

(Continue on a separate sheet if necessary)

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?

No I do not wish to participate at the oral examination

Yes I do wish to participate at the oral examination

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