



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:

X
X
X

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**



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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 Proposed Change 5

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 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 checked="" 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.

Proposed Change 5 of the Proposed Submission SIR sets out the proposed changes to Policy GROWTH 1. Proposed Change 5 confirms that the plan period for replacement Policy GROWTH 1 will not be extended beyond 2031 as part of the SIR.

The adopted Policy GROWTH 1 of the East Cambridgeshire Local Plan is a strategic housing policy. The replacement to Policy GROWTH 1 will also be a new strategic policy that provides a new housing target. Paragraph 22 of the NPPF states that *“Strategic policies should look ahead over a minimum 15 year period from adoption¹⁵, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure”*. Footnote 15 relates to town centre development and is not relevant to the SIR. Paragraph 67 of the NPPF expects planning policies to identify a supply of specific deliverable sites for years 1 to 5 of the plan period, and specific developable sites for years 6 to 10 and where possible for years 11 to 15 of the plan. The SIR anticipates that a replacement to Policy GROWTH 1 would be adopted in late 2023, which represents a timeframe of approximately 8 years until the end of the plan period in 2031. A replacement to Policy GROWTH 1 with a revised housing target that does not look ahead for a minimum of 15 years is inconsistent with national policy contained in Paragraphs 22 and 67, and as such represents an unsound approach.

As set out in Paragraph 3.4 of the SIR, the reason that the Council has decided not to extend the plan period beyond 2031 is because it would have implications for the housing requirement and result in a need to allocate additional land for housing and other types of development. The Council's preference is to undertake a full review of the adopted Local Plan once any changes to the planning system have been confirmed. There is no reference to the requirements of national policy contained in Paragraphs 22 and 67 of the NPPF in the Council's explanation for not extending the plan period, and do not justify taking an approach to a new strategic policy that is inconsistent with national policy.

It should be noted that potential changes to the planning system have not prevented neighbouring authorities within the housing market area, and others within the Oxford to Cambridge Arc, from

progressing a full review of their adopted plans. For example, the Greater Cambridge Local Plan and West Suffolk Local Plan are being prepared by neighbouring authorities within the housing market area. Bedford Borough is progressing an early Local Plan review, and Central Bedfordshire is about to start a Local Plan review despite adopting a plan in 2021. There are other authorities within the Oxford to Cambridge Arc that are still progressing Local Plan reviews, despite potential changes to the planning system and the emerging Arc Spatial Framework.

It is noted that the neighbouring authorities within the housing market area that have started the review process for adopted development plan documents all propose indicative plan periods ending in 2040. The consultation documents for the Greater Cambridge Local Plan, Fenland Local Plan and West Suffolk Local Plan all refer to plan end dates in the early 2040's. The SIR would be out of step with the plan periods for these neighbouring areas.

For all these reasons, it is requested that the plan period for the SIR is extended so that the replacement Policy GROWTH 1 provides a housing requirement that looks ahead a minimum of 15 years from adoption e.g. to 2038 if SIR is adopted in 2023, or preferably to the early 2040's to be consistent with the emerging plans for neighbouring authorities within the housing market area. The requested minimum 15 year timeframe for the replacement Policy GROWTH 1 would be consistent with national policy contained in Paragraphs 22 and 67 of the NPPF.

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 following changes are requested to Proposed Change 5 and replacement Policy GROWTH 1:

- **It is requested that the plan period for replacement Policy GROWTH 1 has a minimum timeframe of 15 years at adoption.**

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:.....