



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:

<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>

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**

East Cambridgeshire Local Plan – Single Issue Review (SIR)



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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 Section 3 (Proposals 1 to 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 checked="" type="checkbox"/>	Don't know <input type="checkbox"/>
Justified	Yes <input type="checkbox"/>	No <input checked="" 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.

Section 3 of the Proposed Submission SIR identifies the proposed changes, and seeks to explain the scope of the proposed changes (Proposal 1), the plan period (Proposal 2), the approach to allocations (Proposal 3), and the housing requirement (Proposal 4). The approach to Broad Areas (Proposal 5) and consequential changes (Proposal 6) are not relevant to these representations. The representations to Proposals 1 to 4 are set out below, but in most cases a summary only is provided here because the issues raised are addressed in more detail elsewhere in other representations.

Proposal 1 describes the scope of the proposed changes to Policy GROWTH 1 and associated supporting text. As set out in the representations to Section 2, it was concluded in the appeal decision at Soham (Appeal Ref: APP/V0510/W/21/3282449) that Policy GROWTH 2 and Policy GROWTH 4 are also out of date, and as such should be updated too as part of the current review process. It is requested that the scope of the proposed changes includes a review and update of Policy GROWTH 2 and Policy GROWTH 4.

Proposal 2 confirms that the plan period will not be extended beyond 2031 as part of the SIR. As set out in the representations to Proposed Change No.5, the proposed replacement to Policy GROWTH 1 will be a new strategic policy that provides a new housing requirement, and as such should have a minimum timeframe of 15 years to be consistent with Paragraphs 22 and 67 of the NPPF. It is expected that the replacement to Policy GROWTH 1 would be adopted in late 2023, which represents a timeframe of approximately 7 years until the end of the plan period in 2031 and would be inconsistent with national policy. It is noted that Proposal 2 does not refer to Paragraphs 22 or 67 in the explanation for not extending the plan period for Policy GROWTH 1. It is requested that the plan period for replacement Policy GROWTH 1 has a minimum timeframe of 15 years at adoption i.e. to at least 2038.

Proposal 3 concludes that no new allocations are necessary as a consequence of the SIR. As set out in the representations to Proposed Change No.4, the proposed housing requirement in updated Policy GROWTH 1 contains no adjustments for growth strategies, strategic infrastructure improvements or to ensure affordable housing needs are met. As set out in the representations to Section 2, it was concluded in the appeal decision at Bottisham (Appeal Ref: APP/V0510/W/21/3282241) that in East Cambridgeshire there was a significant need for affordable housing, an affordable housing shortfall, persistent under-delivery of affordable housing, an increasing need for older persons housing, and a current shortfall in

extra care accommodation. According to the Council's Housing Register there are currently 9 households with a local connection to Dullingham with an affordable housing need. The decision to make no adjustments to the housing requirement, particularly to address affordable housing needs, is inconsistent with Section Id.2a of the Planning Practice Guidance. It is considered that a higher housing requirement would require additional allocations. Dudley Developments owns land off Stetchworth Road in Dullingham that could provide a proportion of affordable dwellings to meet the current identified needs. The decision to ignore the needs for affordable housing, older persons housing, and extra care accommodation in SIR is inconsistent with Paragraph 61 of the NPPF and with Section Id.63 of the Planning Practice Guidance. It is considered that additional allocations are required to meet those housing needs because there is no evidence in SIR that those needs would be met by the replacement to Policy GROWTH 1.

Proposal 4 explains the approach to the proposed housing requirement in the replacement Policy GROWTH 1. It is proposed that no adjustments are necessary to the local housing need figure derived from the standard method. As set out in the representations to Proposed Change No.4, adjustments should be made to the housing requirement. Section Id.2a of the Planning Practice Guidance identifies the factors that might indicate adjustments to the local housing need figure, and include growth strategies, strategic infrastructure improvements or to ensure affordable housing needs are met. All of these factors are dismissed in Proposal 4, despite the evidence of a significant need for affordable housing, an affordable housing shortfall, and persistent under-delivery of affordable housing. As set out above, there are current affordable housing needs in Dullingham that would not be met by SIR. Section Id.63 of the Planning Practice Guidance expects development plans to identify the housing needs of older people. Proposal 4 (and adopted and replacement Policy GROWTH 1) does not mention the housing needs of older people, despite an identified need for older person housing and extra care accommodation in East Cambridgeshire. It is requested that appropriate adjustments are made to the housing requirement in replacement Policy GROWTH 1 to reflect the factors identified in the Planning Practice Guidance, and in particular to address affordable housing needs and older person housing needs.

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 Section 3:

- It is requested that the scope of the proposed changes (Proposal 1) includes a review and update of Policy GROWTH 2 and Policy GROWTH 4
- It is requested that the plan period for replacement Policy GROWTH 1 (Proposal 2) has a minimum timeframe of 15 years at adoption
- It is requested that appropriate adjustments are made to the housing requirement in replacement Policy GROWTH 1 to reflect the factors identified in Sections Id.2a and Id.63 of the Planning Practice Guidance, and in particular to address affordable housing needs and older person housing needs.
- It is considered that all of the above requested changes would result in a need for additional allocations.

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

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Or post to: Local Plan Consultation, East Cambridgeshire District Council, The Grange, Nutholt Lane, Ely, Cambs CB7 4EE

(Office only) Ref:.....