

Ref: GA/DJ/01322/L0003

13th June 2022

Sent by email to: planningpolicy@eastcambs.gov.uk

Local Plan Consultation
East Cambridgeshire District Council
The Grange
Nutholt Lane
Ely
Cambs
CB7 4EE

Dear Sir / Madam,

**Representations to East Cambridgeshire Local Plan – Single Issue Review (SIR)
Proposed Submission Stage Consultation**

On behalf of our client, Castlemore Homes, we are pleased to provide comments on the Proposed Submission Stage consultation of the East Cambridgeshire Local Plan – Single Issue Review (SIR). Our representations are set out in this letter and the enclosed forms.

Our client has significant concerns regarding the approach being taken by East Cambridgeshire District Council ('the Council') in reviewing its Local Plan, as set out below:

- **Failure of Local Plan 2015:** There is no recognition in the Single Issue Review document of the failure of the Local Plan 2015 to deliver its housing requirement. The Local Plan 2015 contains a housing requirement of 11,500 dwellings over 20 years (or 575 dwellings per annum (dpa)) and against this requirement the Council has delivered just 3,018 dwellings during the first 10 years of the plan period (or c.302 dpa). This is just 52.5% of the housing requirement (i.e. barely half) and if it hadn't been for changes to national planning policy (i.e. the introduction of the standard method that removes the requirement to take account of past under-delivery) the Council would now have a perpetual 5 year supply shortfall.
- **Need for a Comprehensive Review:** The Local Plan 2015 has failed to deliver and yet rather than recognise this point by producing a comprehensive review of the document, the Council has sought to simply update their housing requirement for the remainder of the plan period (i.e. 9 years to 2031) so that the plan can continue to be considered up to date and the Council can avoid making any difficult decisions on the long term growth of the district. This is not the strategic approach required by national policy and the justification put forward for not undertaking a comprehensive review at this stage does

The Exchange | Colworth Science Park
Sharnbrook | Bedford | MK44 1LZ
t 01234 867135 | e info@arplanning.co.uk | w www.arplanning.co.uk

Armstrong Rigg Planning Ltd
Registered in England & Wales No 08137553. Registered Address:
The Exchange, Colworth Science Park, Sharnbrook, Bedford, MK44 1LQ.

not stand up to scrutiny. In the Second Consultation Report¹ the Council state that it *"does not seek to prepare a full local plan update at this stage, and sees no fundamental evidence suggesting a need to do so. A full local plan update is the appropriate place to extend the end date to 15 years following adoption (and bring forward the start date), and such a plan will be prepared in the context of a new planning system being brought in by Government"*. With respect to the first point, we consider that the comprehensive failure of the Local Plan to deliver its housing requirement demonstrates a clear need for a comprehensive review. With respect to the second point, guidance provided by the Department for Levelling Up, Housing and Communities (DLUHC) has been consistently clear that Local Planning Authorities (LPAs) should not delay their plan making work in anticipation of wider changes to the planning system.

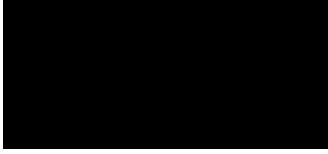
- Plan Period:** The decision not to undertake a comprehensive review of the Local Plan 2015 renders the Single Issue Review contrary to national policy at paragraph 22 of the NPPF which requires strategic policies to look ahead over a 15 year period from adoption. In the quote above from the Second Consultation Report the Council state that a *"full local plan update is the appropriate place to extend the end date to 15 years following adoption"*. We agree, but in accordance with NPPF paragraph 22 it is clearly not appropriate for an LPA to adopt a new strategic policy that does not look ahead over a 15 year period. The Council's only option is therefore to undertake a full Local Plan review.
- Housing Requirement:** We consider that a full Local Plan update is required which would necessitate a new housing requirement for a minimum period of 15 years from adoption. However, should the Inspector find that the Council are justified in revising their housing requirement for the remaining years of the plan period only, we consider that there is no justification for the Council to retrospectively revise its housing requirement for the first 11 years of the plan period to match the number of homes delivered. Following adoption in 2015, the housing requirement set by Policy GROWTH 1 was up to date for 5 years (i.e. up to September 2020) in accordance with NPPF paragraph 74. The Council's housing requirement should therefore be their Local Plan OAN up to 2020 (i.e. 2011-2020 = 575 x 9 = 5,175) and then their LHN for the remainder of the plan period (i.e. 2020-2031 = 599.78 x 11 = 6,597.58) giving a total requirement of 11,772.58 (588.63 dpa). Whilst this produces a similar annual requirement to that contained in the Single Issue Review, this matter has important implications for the strategy set by the Local Plan. Planning Practice Guidance (ID: 2a-011) is clear that *"Where an alternative approach to the standard method is used, past under delivery should be taken into account"*. For the first 9 years of the plan period, the Council's housing requirement is not based on the standard method and past under delivery should therefore be taken into account (i.e. the Council should be planning to meet past under delivery in its Local Plan review).

In the context of our comments above, it should be clear that the Single Issue Review cannot be considered sound. It has **not been positively prepared** as it doesn't seek to meet the area's objectively assessed needs (either for the current plan period including past under-delivery or for a new plan period that would plan ahead for a minimum period of 15 years) and it is **not consistent with national policy** which requires strategic policies to plan ahead for 15 years. It is also **not justified** given that the reasonable alternative supported by national policy and guidance is to undertake a comprehensive review and we are aware of no statement of common ground with neighbouring authorities which means the plan **cannot be considered to be effective**.

We trust that these comments will be given due consideration during the examination of the plan and we look forward to participating further going forwards.

Yours sincerely

¹ Second Consultation Report, East Cambridgeshire District Council, March 2022



Geoff Armstrong [redacted]
Director
Armstrong Rigg Planning
Direct Line: [redacted]