

P19-2539

13 June 2022

Strategic Planning Team
East Cambridgeshire District Council
The Grange
Ely
Cambridgeshire CB7 4EE
By Email only

Dear Sir / Madam

East Cambridgeshire Local Plan – Single Issue Review (of its 2015 Local Plan)
Proposed Submission Stage (Reg 19), May 2022

I write further to the consultation identified above on behalf of my client, Vistry Homes. My comments follow on from my previous submissions made to Stage 2 in May 2021 and February 2022, each of which were submitted by email. This third consultation does not address the fundamental issues raised in those previous submissions and therefore those comments remain relevant. I rely on the comments made in those submissions and do not seek to repeat comments previously made.

It is noted under Proposal 5 that the Council, following consideration of the Broad Piece, Soham appeal decision¹, has taken the step of amending supporting text to Policy GROWTH 1 to state that *'the principle of development coming forward on the Broad Areas is now established'*. Whilst I have no objection to the inclusion of this statement in the supporting text, I do not consider the amends go far enough to resolve the issues raised by the Appeal Inspector in the above referenced decision.

The issues extend beyond just the Broad Areas. The Appeal Inspector states *'...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 Aocational strategy can be relied upon to significantly boost housing delivery in line with the National Planning Policy Framework (the Framework).'* This is a clear reason to investigate the appropriateness of relying on the standard method to address the housing needs of the District – which has not been done so by the Council. This includes the failure of the current Local Plan to provide sufficient affordable housing, leading to a prolonged shortfall in affordable housing provision in the District.

Following on from the above, the Appeal Inspector also states *'...it can no longer be said that sufficient housing can and will be accommodated within the defined settlement envelopes. This is particularly so when the plan itself anticipated that development outside of the envelopes would at some point be needed within the plan period, at the broad locations identified.'* An amend to the supporting text does not go sufficiently far enough to resolve this. An amend to Policy GROWTH 2 is also required to confirm that development outside of settlement envelopes

¹ APP/V0510/W/21/3282449 – Land to the North East of Broad Piece, Soham (11 February 2022)

will be controlled except where Broad Areas for development are identified, firming up the commitment to deliver housing in these Areas in the latter part of the Local Plan period.

The Local Plan states that 'the next review of the Local Plan will provide an opportunity to undertake further investigative work relating to delivery and site boundaries.' The review that is currently underway is therefore the right time for specific site boundaries to be identified for the Broad Areas, as the housing shortfall clearly demonstrates that the current allocations are not sufficient to deliver necessary housing.

The fundamental issues that I raised in my comments to the first and second consultations remain valid and have not been fully addressed by this third consultation, by way of either amendment or justification for a lack of amendment. I therefore maintain my objection to the scope and result of the review, and welcome the opportunity to attend the Examination session at the appropriate time.

Yours faithfully

Nicky Parsons



Executive Director

