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CAPL497992/PR



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Dear Sirs,

East Cambridgeshire Local Plan – Single Issue Review (of its 2015 Local Plan)

Savills (Cambridge Planning) is instructed on behalf of Bellway Homes Limited to make representations in response to the current consultation being undertaken by East Cambridgeshire District Council. Along with many other interested parties we wrote to the Council at the Reg.18 stage of consultation to express the view that the approach being taken, in terms of the narrow focus of the single issue review was unsound. We have looked at the Second Consultation Report (March 2022) and note that essentially, the Council has chosen not to accept any of the arguments put forward for the adoption of a more comprehensive review. For the purposes of this consultation I have therefore repeated the points I set out in my letter of 3rd February for consideration by the examining Inspector.

It is clear from looking at the earlier consultation document in 2021 that the broad thrust of the Council's approach to the SIR has remained unchanged. There have been detailed adjustments to some of the text and numbers in the second Reg 18 consultation which closed in February 2022, made in response to the points raised by responders to the earlier consultation, but on the wider concerns put to the Council the decision has been taken not to change the nature of the SIR.

In particular it is noted that the Council has chosen not to take the opportunity to look more widely at the opportunities to increase the delivery of homes and the infrastructure that new residents depend on until a future date. Given the timescale for producing new Local Plans it appears that the Council do not intend to consider a full review of the Local Plan until after this SIR is completed (2023/4) and there can be no guarantee therefore that a new plan will come into force until perhaps 2027/8 at the earliest. A significant factor in the Council's decision-making on this seems to have been the resource demands it would impose and the potential for changes to the planning system to be announced that would make the process undertaken in the meantime abortive. Neither of these are sufficient reasons for pushing ahead with a Single Issue Review that ignores the challenges the Council faces. On this basis, and considering the evidence, presented about

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housing need and delivery, my clients are concerned that the SIR is too narrow and that, by isolating the need to update the basis for calculating housing need, it fails to address the current evidence of under-delivery. In this way it fails to be the aspirational and deliverable plan advocated by NPPF para 16(b). Instead it aims to cement a rate of growth and spatial delivery pattern for the remaining years of the current plan without contemplating the infrastructure needed by the community now or frontloading this for the future needs of the community beyond 2031.

By way of example, the Council has in the past year refused two applications for housing at Isleham, based in part on the lack of capacity of the village primary school. That lack of capacity exists now and is becoming gradually more severe as infilling and other small-scale housing developments take place within the settlement. The capacity issue is only realistically likely to be addressed by the joint efforts of the County Education Authority and prospective developers of land around the village beyond the present settlement limits. The defensive stance taken in the SIR means that this current problem will not be faced seriously by the Council until the end of the decade. This is only one of the results of the decision to focus solely on the definition of Housing Need.

In terms of the evidence now published there is clearly a step-change assumed in the rate of delivery of housing in the District. The rate of delivery in the first ten years of the plan is said to have been 302dpa (rounded up) totalling 3,018 new homes. The required rate of delivery in the second ten years of the plan is now forecast to be 615dpa, in order to meet the need for 6,157 new homes. There is no evidence of anything having happened or having been put in place to encourage a doubling of the delivery rate. Simply publishing a review that sets out the new numbers is not a responsible approach to Plan-making. The Second Consultation Report has little to say on this point. Without any analysis or explanation of reasons the report notes that completion rates reached 514 for the year 2019/20 (before falling again in 2020/21 to 405 during the covid lockdown period) and that the writer is confident that these rates can be extended further to meet the updated requirement of "c600" per annum. The Council has provided no evidential basis for this confidence which is nevertheless of crucial importance to the decision to continue with the current narrow focussed approach.

The Council has proposed no changes to any existing policies which might encourage accelerated delivery of new homes to the required rate and neither has it proposed to allocate any additional sites. No changes are proposed that would alter the prospects for bringing forward exception sites. They say simply that were they to address such matters now this would go beyond the chosen 'narrowly focussed' single issue approach. In fact any and all of these steps would have been appropriate at this time if the Council is realistic about achieving the delivery of the target figures now published. It would however require a more thorough (however politically challenging and costly) review of the Local Plan. It is clear from the Council's published responses to date that this would be unpalatable to the Council at this time and this may be over-riding the common sense case for reviewing the whole local plan.

It is noted that the Second Consultation Report acknowledges the appeal decision made by Inspector Michael Boniface on 11th February 2022 relating to Broad Piece, Soham [APP/V0510/W/21/3282449] under the heading of Broad Locations. The report says that the decision has been taken into account in updating the SIR for its final consultation. It is noted that the decision appears to have been considered only in relation to the status of the Broad Locations (see paragraphs 3.9-3.18 of the Proposed Submission Stage Document).

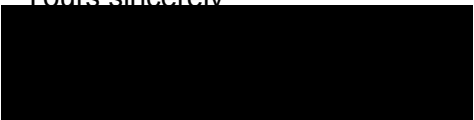
In our view the Council has chosen to ignore the more fundamentally relevant content of the appeal decision where the Inspector, being in possession of the Council's evidence on the matter, and able to question the Council's witness, concludes that the Single Issue Review approach adopted by the Council SHOULD include GROWTH 2 and GROWTH 4 because they are now out of date [para 14 and 20].

The conclusions reached by the Inspector concerning the prospects for meeting future housing delivery requirements [para's 15-18] support the representations we and others made to the previous Reg 18 consultations. He concludes *'even if the Council can currently demonstrate a deliverable housing land supply in the region it suggests against its Local Housing Need, that does not make the long-term strategy of the ECLP any more reliable when it comes to housing delivery.*

In summary, the narrow focus adopted by the Council ensures that the published numbers are now calculated in accordance with the new methodology, but in our view, and to some extent supported by Inspector Boniface, the net result is likely to be continuation of a plan that has been failing to deliver at the required rate and where the Council has chosen to avoid addressing this fact, preferring to defer meeting the needs identified for growth and the infrastructure needs of the current communities, until the next decade. In our view the Single Issue Review is therefore unsound because it fails to meet the test of being

- Positively Prepared
- Justified or
- Effective

Yours sincerely



Paul Rowland DipEnvP MRTPI
Director