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23955/A3/DM/jc

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Dear Tony,

RE EDEN LOCAL PLAN EXAMINATION – SEPTEMBER PROGRAMME

Thank you for your emails of the 1st and 4th September 2016 in relation to the Local Plan Examination. Firstly, I can confirm that I will attend the Hearing alongside a representative of Story Homes and that we are available from Monday 12th to Wednesday 14th September 2016 inclusive. However, please note that we are unable to attend any sessions on Thursday 15th September 2016 but note that this is a reserve day.

The two emails that we have received include a number of additional documents in relation to the emerging Local Plan, some of which contain important new information which our Client would like to review and fully digest before responding.

As this is the first working week back from the summer holidays and as we have only received this information, can you confirm the deadline by which further representations need to be submitted? Whilst we note that the sessions next week will discuss a number of these papers, sufficient time is needed to allow for a full response.

We particularly note there has been a fundamental change in the Council's overall development strategy. Appendix 1 to the paper '*Supply of Key Housing in the Key Hubs*' – July 2016 attached to your email of 4th September, includes a letter dated 17th August to the Inspector.

In the letter, the Council proposes an entirely separate statutory development plan document to allocate land for housing and employment in Key Hubs. This is a fundamental change in the Council's approach to the Local Plan which does not align with the Council's submissions in the early stages of the Local Plan process. The Draft Local Plan as submitted does not now accord with the Council's Local Development Scheme. Effectively, this raises questions whether the submitted plan is legally compliant.



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Consequential changes to the new approach mean that there is increased importance on understanding the deliverability of the Council's housing land supply at this point. We have also received a new housing land supply paper from the Council including an updated schedule of sites which the Council claims to be deliverable, including the anticipated rate of delivery of some of the proposed site allocations.

Our Client wishes to make comments to this paper once we have had the opportunity to digest the information. In particular, with the timescales for the preparation, consultation and examination of a separate Site Allocations DPD entirely unknown, this raises concerns as to whether additional policies or changes to existing policies are required to enable flexibility in supply in the intervening period (i.e. from when the Part 1 Local Plan is adopted to the adoption of the Site Allocations DPD). In this regard, there is a need to consider whether new policies or wording needs to be created to enable greenfield peripheral site releases should the Site Allocations DPD be delayed in any way. Story Homes believe that there is a real risk attached to the emerging Eden Local Plan that the Council will not be able to demonstrate a five year housing land supply at adoption of the Plan or within its early years of the Plan period. It is for these reasons that we wish to be afforded additional time to review these latest papers.

We will of course endeavour to make a positive contribution to the discussion next week on those matters where we are able to at this point.

Yours sincerely



DAN MITCHELL
Partner