

Name:

Part B – Your representation on the Main Modifications and/or supporting documents

If you wish to make more than one representation, please complete a separate [Part B form](#) for each representation and clearly print your name at the top of this form.

4. Which **Main Modification number and/or supporting document** does your representation relate to? (Each Main Modification within the Schedule has a reference number. This can be found in the first column i.e. MM1, MM2 and each Supporting Document has a reference number beginning with ED).

Any representation on a supporting document should clearly state (in question 6) which paragraphs of the document it relates to and, as far as possible, your comments should be linked to specific Main Modifications. You should avoid lengthy comments on the supporting documents themselves.

MM no.

Supporting document reference

5. Do you consider this **Main Modification and/or supporting document**:
(Please refer to the Guidance notes for an explanation of terms)

- a) Is Legally compliant Yes No
- b) Sound Yes No

If no, then which of the soundness test(s) does it fail

Positively prepared Effective
Justified Consistent with national policy

6. Please give details of why you consider the **Main Modification and/or supporting document** is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance, soundness of the Local Plan or compliance with the duty to co-operate, please also use this box to set out your comments.

The Council are reliant on a stepped approach to the housing requirement, and we are concerned about the proposed increase in the housing requirement from 2025. It is not considered that there are sufficient sites allocated in the Plan, or other commitments within the District, to enable the proposed increase in housing delivery to be met. In addition, the plan will, at best, only have an 11 year time horizon on adoption, compared to a NPPF requirement for 15 years.

Although the NPPF requires Local Plan's to be aspirational, they also should be realistic. The stepped requirement, as proposed, is not considered to represent a strategy that seeks to meet the District's

housing requirement or is achievable based on the allocations that are currently proposed in the Plan. If the steps that are currently proposed are to be met, the Plan should have sought to allocate more housing sites, or the Council will be reliant on delivery from sites out with the local plan process in order to meet this ambitious target ahead of the adoption of the subsequent review of the plan.

This adds weight to the importance of the completion of the plan review at the earliest opportunity in order to maximise the possibility that these high rates of housing delivery can be achieved and sustained.

7. Please set out what change(s) you consider necessary to make the **Main Modification and/or supporting document** legally compliant or sound, having regard to the test you have identified in the question above (Positively prepared/Justified/Effective/Consistent with national policy) where this relates to soundness. You will need to say why this change will make the Submission Version of the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The supporting text to Policy SP 2 should be updated as follows:

The local housing requirements in Policy SP 2 will be assessed as part of an immediate review of the adopted Local Plan, as outlined in Policy D8

(Continue on a separate sheet if necessary)

8. Have you attached any documents with this representation which specifically relate to an MM or supporting document?

Yes

No

Signature:

Date

23.9.21