

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.

This states that the plan has developed a plan led approach for the consideration of these sites. This is factually inaccurate.

The Plan simply devolves the identification and delivery of the important mitigation measures to a non-statutory document. It is misleading for the Main Modification to suggest that the Plan has properly considered this issue and it most certainly has not resolved this issue. It has very much been an enforced alteration to the strategy at the final examination stage and the approach now being proposed is far from a plan led approach. It is simply trying to mitigate the impact of development in locations that were determined without any consideration of the need for mitigation or any consideration of the reasonable alternatives. Certainly the decisions made regarding the location and scale of growth in the early part of plan process made no concessions regard the need to provide extensive SANGs, as is demonstrated by the inability of the proposal at North Weald Bassett to provide such a meaningful provision.

The Council's present strategy is not a plan led approach as none of the mitigation measures are actually identified and confirmed in the plan (for example there is no indication in the plan as to the location of the SANGs that are required).

These main modifications should be rejected as they are factually incorrect and misleading.

While this leaves the plan as being unsound, that is not a change in its status. It merely confirms the scale of the task which now faces the Council, which should not be evaded at the examination.

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.

Section 1 in the accompanying representations report (ref. 09.22.21.E5045.2PS.PeerGroup.MainMods.Final with Appendices) sets out in detail how the Local Plan should be amended to ensure that deliverable SANG provision is achieved.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. **After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

(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:

....Redacted....

Date

22nd September 2021