

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 paragraph is now factually incorrect.

The master plan produced for the Council by Allies and Morrison (EB1003) did not conclude that there was a minimum of 1,050 and did not recommend the proposed site allocations advanced by the Council. The master plan assessed sites to the south of North Weald Bassett to be the best allocations in North Weald Bassett. The Council ignored that advice from its own consultant and instead chose a path that was not sound or compliant with the requirements of a SA. This has been previously highlighted in the examination to the Inspector and the Council. The Council has been unable to provide any evidence that the submission plan was based on any advice or conclusion in the master planning process. In fact, the opposite is true.

It is also factually incorrect that the proposed allocations can deliver a minimum of 1,050 dwellings as stated, as the nature of the mitigation required to deliver this number of homes has not been tested either in terms of its appropriateness nor its deliverability. These objections have highlighted the very substantial shortcomings in the GIS proposals both in terms of high numbers of Natural England's "must haves" which the proposal does not have and that to secure the SANGs objectives and experience there is a clearly a reliance on land outside of the control of the Council and the developers which cannot be resolved without full and proper engagement with Peer Group.

This main modification should be rejected for these reasons.

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.

*(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

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Signature:

....Redacted....

Date

22<sup>nd</sup> September 2021