

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 proposed allocations cannot deliver a minimum of 1,050 dwellings as proposed to be amended. 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 or the reasonable alternatives. These objections have highlighted the very substantial shortcomings in the GIS proposals for this development both in terms Natural England’s “must haves” which the current proposal in North Weald Bassett does not have. To secure the SANGs experience in North Weald Bassett, there is 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.

To secure the SANGs experience on land within the control of the Council and developers would require a substantial additional area under their control to be left undeveloped thus reducing the number of dwellings that can be delivered. Even in these circumstances any open space delivered will still be very much contained by a very urban environment and will lack the SANGs experience required by Natural England.

While a more accurate modification may be a change from “a minimum” to “a potential maximum” such a modification in itself would be unsound as there would be no certainty as to the level of dwellings that could actually be delivered. This however is exactly the circumstances that exist - there is sufficient uncertainty regarding the delivery of the allocated sites and the necessary mitigation (including a SANG) to render those sites undeliverable in the context of the Framework.

The proposed modifications do not result in making the plan sound. It would remain unsound even with this amendment. As such we object to these proposed modifications.

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)*

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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