

Stakeholder Reference:
Document Reference:

Part A

Making representation as CPRE

Personal Details		Agent's Details (if applicable)	
Title	Mrs		
First Name	Patricia		
Last Name	Moxey		
Job Title (where relevant)	Vice Chairman		
Organisation (where relevant)	CPRE Essex		
Address			
Post Code			
Telephone Number			
E-mail Address			

Part B

REPRESENTATION

To which Main Modification number and/or supporting document of the Local Plan does your representation relate to?

MM no: 3

Supporting document reference:

Do you consider this Main Modification and/or supporting document of the Local Plan to be:

Legally compliant: No

Sound: No

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

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.

It is essential that all the work undertaken to produce the Neighbourhood Plan within EFDC is recognised and that these will sit alongside Local Plan Policies and become part of EFDC Development Plan and NPPF in planning law and must be complied with once completed. NPPF Para 29 states 'Neighbourhood Plans (NP) can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan.' See Para 30 which states that Neighbourhood Plan policies 'take precedence over existing non-strategic policies in a local plan covering the neighbourhood area'.

To help people in all EFDC local communities engage with the process of preparing NPs so they can have an input into such plans, the process should be integrated in all relevant areas throughout the Local Plan, with references to the NPPF 2021 such as:

- ability for NPs to designate Local Green Space NPPF paras 101 and 102 to be referenced in EFDC Local Plan SP7;
- NPPF Para 127 so plans can effectively incorporate local design and policies;
- NPPF 140 on NPs being able to make detailed amendments to previously agreed changes to Green Belt boundaries

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.

see above

Signature: Patricia Moxey Date:
23/09/2021