

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.

We are supportive of the modifications to Policy P6 which clear up inconsistencies within the Plan and clarify policy interpretation. These will aid applicants and decision is makers accordance with the NPPF 2012 paragraph 154.

We support the change to **Part B (i)**, which re-names site NWB.R1 “Land West of Tylers Green” to be consistent with site NWB.T1.

*(Continue on a separate sheet if necessary)*

We note that individual site housing targets have been removed and instead a minimum target of 1,050 has been applied to the whole Masterplan Area. The minimum target is underpinned by the Local Plan evidence base, specifically the Site Selection Report 2018 (EB805 and associated appendices EB805A to EB805P) and Housing Trajectory (Local Plan Appendix 5 as amended by MM115) which contain individual site targets and simultaneous delivery rates and we have no objection to this modification.

We welcome the greater clarity introduced to **Parts F and G**. However, our concern that this policy requires strict adherence to the IDP which is a non-statutory planning document, which was not subject to the same scrutiny via the Examination process as the Local Plan policies, so should not be used to set policies or determine development proposals. The IDP remains a ‘wish list’ with estimated costs which have not been demonstrated to satisfy the tests of planning obligations set out in the NPPF. We suggest that “*must be delivered....*” is replaced with “*should be delivered...*” and “*in accordance with...*” replaced with “*have regard to...*” the IDP.

Additionally, it is not clear how parts (i) to (vi) are changing. Changes are proposed to (i) and (ii), then the schedule refers to a new part after (i) relating to active and sustainable transport. It then goes on to set out changes to/deletions of parts (iv), (v) and (vi). We would like clarity on whether this means part (iii) has been deleted or remains unchanged?

We support the modification to **Part K** which aligns the Strategic Masterplan requirement for North Weald Basset with Policy SP3 and paragraph 2.95 and increases flexibility and deliverability. We welcome the clarity provided by the modifications to **Part L**, however, are concerned that the new part after (v) and amendments to (vii) relating to SANG and east-west connectivity are too precise.

Whilst we are supportive of the principle, this specifies a location outside of the two Masterplan Areas. Whilst the schedule indicates that the reason for the change/source is the IDP Update, this location is only mentioned in the Green Infrastructure Strategy (ED124A-G/ EB159A-G), which is a supporting evidence/background document recently added to the evidence base. As a non-statutory planning document, this should not be used to set policies or determine development proposals.

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.

**Parts F and G:**

*“must be delivered...”* To be replaced with *“should be delivered...”* and *“in accordance with...”* replaced with *“have regard to...”* the IDP.

***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.***

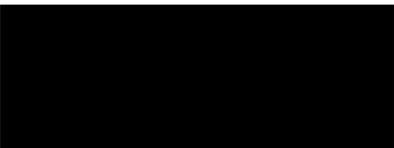
*(Continue on a separate sheet if necessary)*

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

Yes

No

Signature:



Date

23-09-21