

Section B: Your Representation

Please complete a separate sheet for each representation that you wish to make. You must complete 'Part A – Personal Details' for your representation to be accepted.

Representations cannot be treated as confidential and will be published on our Consultation Portal. Any representations that are considered libelous, racist, abusive or offensive will not be accepted. All representations made will only be attributed to your name. We will not publish any contact details, signatures or other sensitive information.

Full Name	Hallam Land Management Limited
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Question 1: Which **Main Modification 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

Any representations on a supporting document should clearly state 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.

Representations on the Policies Map must be linked to specific modifications in that they reflect a change required as a result of a Main Modification.

Schedule of Potential Main Modifications	MM no.	<input type="text" value="MM10"/>
Sustainability Appraisal	para(s)	<input type="text"/>
Habitat Regulations Assessment	para(s)	<input type="text"/>
Policies Map or other supporting documents	Please specify	<input type="text"/>

Question 2: Do you consider this **Main Modification and/or supporting document**:

Legally Compliant?

YES

NO

Sound?

YES

NO

Question 3: If you consider the **Main Modification and/or supporting document** unsound, please indicate which of the soundness test(s) does it fail (please mark all that apply):

Not positively prepared

Not justified

Not effective

Not consistent with national planning policy

Question 4: Please provide details of either:

- Why you consider the **Main Modification and/or supporting document** to be sound or legally compliant; or
- Why you consider the **Main Modification and/or supporting document** to be unsound or is not legally compliant.

The following four points are made:

1. Policy MG06 proposes a partial review of the Plan with the objective of meeting the full Objectively Assessed Housing Needs.

The Framework requires (paragraph 61) that strategic policies should (in addition to the Local Housing Need figure) take into account any unmet needs that cannot be met within neighbouring areas when establishing the amount of housing to be planned for. For the partial review to exclude any consideration of unmet needs is contrary to national policy. The wording of the policy should therefore be amended to include reference to addressing unmet needs from neighbouring areas. This is important in the context of the preparation of the South Essex Joint Strategic Plan which will provide a framework for the partial review.

2. Policy MG06 proposes submission of the partially reviewed Plan within 28 months.

The proposal to submit the partial review for Examination within 28 months is not justified by any evidence.

Further, 28 months is not appropriate in the context of an adopted Plan (assuming this Plan is adopted in 2022) which does not meet Local Housing Need and contains strategic policies that only look ahead 11 years from adoption (as opposed to the national policy requirement of a minimum of 15).

A shorter timeframe to submission should be agreed with the Council.

3. Policy MG06 sets out a list of specific matters to be addressed within the partial review.

As noted above under Point 1, reference should be made to addressing unmet needs from neighbouring areas within the list of specific matters to be addressed.

4. Policy MG06 lacks clarity as to the consequence of the Council failing to submit the partial review.

If the Plan is to be found sound on the basis that there is to be a partial review to address its 'unsoundness', the policy needs to be worded in a way that requires the Council to deliver the partial review and address the deficiency in its soundness. The policy is currently worded on the basis that the Council will do a partial review. The policy should be worded on the basis of what happens if the Council do not do a partial review. If the review is not submitted for Examination by the agreed date, then the Plan should be deemed 'out-of-date' for the purposes of decision-taking. The policy should be amended accordingly.

Please continue on a separate sheet if necessary

Question 5: Please set out what change(s) you consider necessary to make the **Main Modification and/or supporting document** sound or legally compliant, having regard to the matters that you identified above.

You will need to say why this change will make the Submission Version of the Local Plan sound or legally compliant. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as accurate as possible.

The first sentence of Policy MG10 should be re-worded as follows:

The Council will bring forward a partial review of the Plan with the objective of meeting in full the Objectively Assessed Housing Needs, including any unmet needs from neighbouring areas as agreed with other authorities.

The second sentence of Policy MG10 should set a shorter timeframe for the submission of the Plan.

An additional sub-heading should be added to the list within the policy related to 'addressing unmet housing needs from neighbouring areas as agreed with other authorities'.

An additional sentence should be added to the end of the policy that states:

In the event the partial review is not submitted by the above date, the Plan shall be deemed 'out-of-date' for the purposes of decision-taking.

Please continue on a separate sheet if necessary