


Part A: Personal Details

*If an agent is appointed, please complete only the Name and Organisation boxes for the client in 'Your Details', but complete the full contact details of the agent.

	Your Details	Agent's Details* (if applicable)
Name (including title):	<input type="text"/>	Sam Lake
Organisation (where relevant):	St Andrew's Healthcare	Turley
Address:	<input type="text"/>	
Post Code:	<input type="text"/>	
Telephone number:	<input type="text"/>	
Email address:	<input type="text"/>	

NOTE:

Representations will only be accepted that refer to a proposed change shown in the *Schedule of Proposed Main Modifications to the Pre-Submission Draft Local Plan (2017)*, the map changes or to the Habitats Regulations Assessment Report, incorporating Main Modifications (2017) or Sustainability Appraisal Report, incorporating Main Modifications (2017).

Your responses on the above documents will be sent to the Planning Inspector without prejudice to the Inspectors final report.

You should not repeat or re-submit your previous representations, these have already been considered by the Inspector during the examination process.

PART B: Your representations

Please use a separate form for each representation.

B1. To which proposed Main Modification does your representation relate?

Please state the relevant reference number that you are commenting on from the Schedule of Proposed Main Modifications (e.g. MM01):

MM28

Description of the proposed Main Modification (e.g. Page 60, Section 8)

Page 122 New Policy after Policy 28

Please complete a separate form for each representation.

B2. Do you consider this proposed Main Modification is:

Legally compliant?

Please select one answer

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
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Sound?

Please select one answer

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
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B3: If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to? 'Sound' means: is the Main Modification justified, effective, positively prepared and consistent with national policy?

Positively prepared?

Please select one answer

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
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Justified?

Please select one answer

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
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Effective?

Please select one answer

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
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Consistent with national policy?

Please select one answer

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
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Your representation should succinctly cover all the information, evidence and supporting information necessary to support/justify your representation and any suggested changes.
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B4. Please give details of why you consider the Local Plan is not legally compliant or is unsound?

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your representations.

St Andrew's Healthcare acknowledge a new policy has been inserted to the Core Strategy to set out the Local Plan review process and note that a Local Plan review will need to be submitted for examination by April 2022.

It is considered that the new policy is partly consistent with national policy particularly paragraph 153 of the NPPF which states:

"Each local planning authority should produce a Local Plan for its area. This can be reviewed in whole or in part to respond flexibility to changing circumstances."

St Andrew's recommended that the Inspector considers adding text to clarify whether the Local Plan should be reviewed in whole or in part.

In addition, the purpose of the new policy is consistent with guidance set out by the Ministry of Housing, Communities & Local Government ("MHCLG") in National Planning Practice Guidance ("PPG"), which provides clarity in production and deliverability of Local Plans. The guidance states at paragraph 008 [Reference ID: 12-008-20140306] the following:

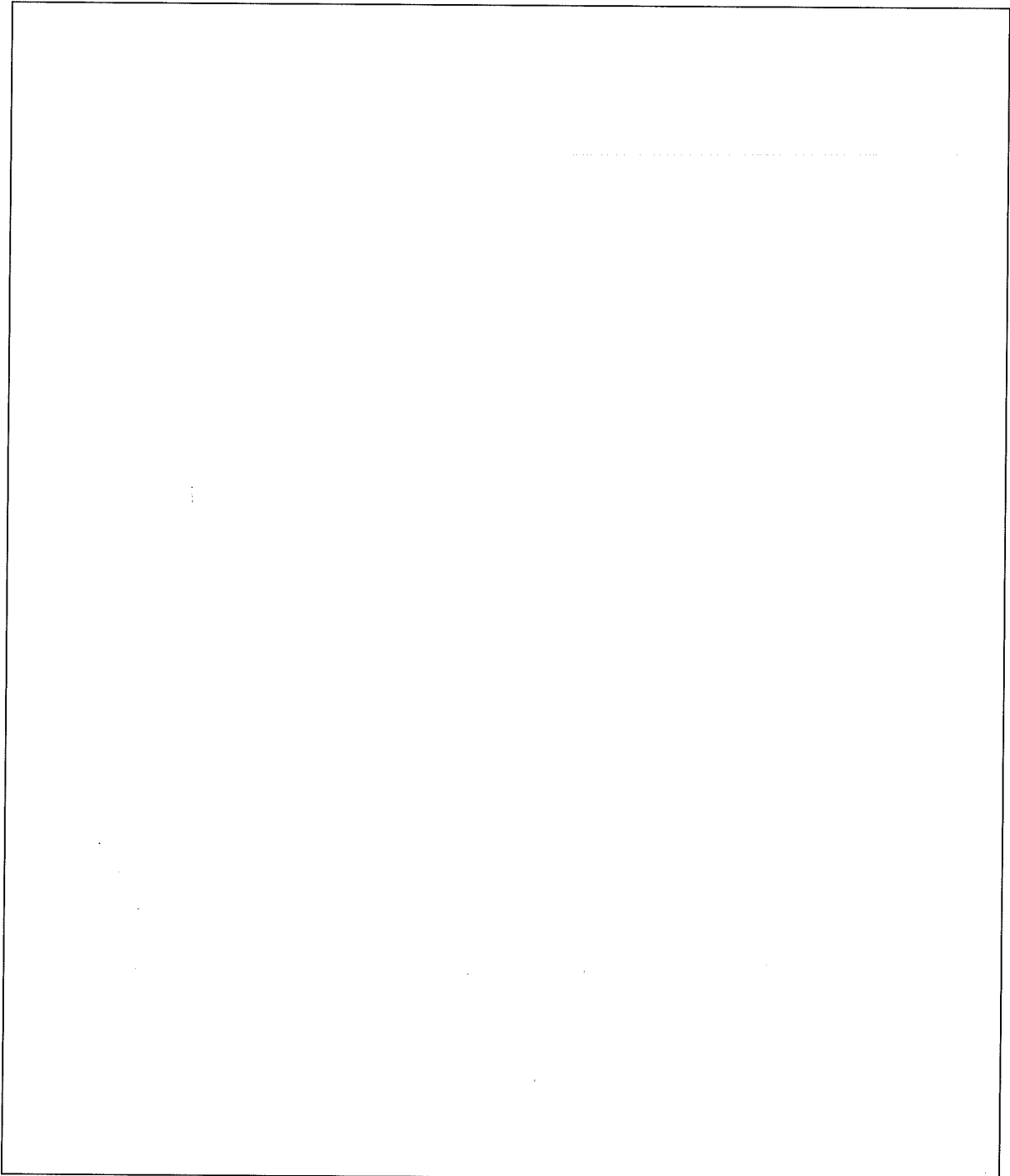
"Most Local Plans are likely to require updating in whole or in part at least every 5 years. Reviews should be proportions to the issues in hand. Local Plans may be found sound conditional upon a review in whole or in part within 5 years of the date of adoption."

St Andrew's consider the five points of justification as set out in the newly inserted policy are strategic issues which will change over time and are proportionate enough to justify a full review of the Local Plan within five years of the date of adoption.

Please be as precise as possible.

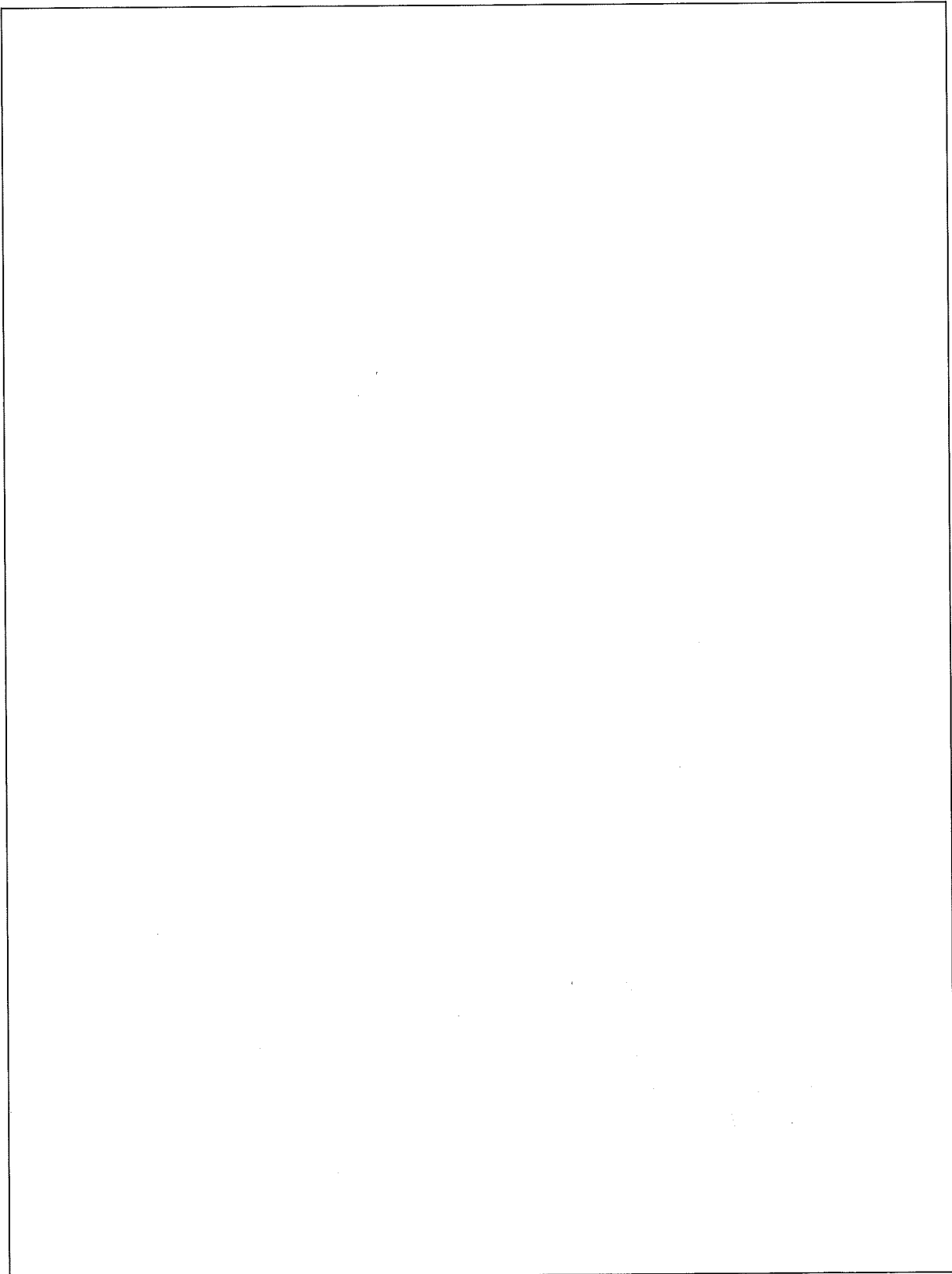
B5. Please set out what changes you consider necessary to make the proposed Main Modification to the Local Plan legally compliant or sound. Having regard to the test you have identified at B3 above where this relates to soundness?

You will need to say why this modification will make 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.



Please be as precise as possible.

B6. Do you have any comments on the updated Addendum to the Sustainability Appraisal or Addendum to the Habitats Regulations Assessment in respect of this particular modification?



Please be as precise as possible.

PART C: Notification request

You can request to be notified at an address or email address of any future stages relating to the Local Plan.

C1. Would you like to be notified of future stages?

Yes No

C2. How would you like to be notified?

By post to my address:

By post to my agent's address:

By email to my email address:

By email to my agent's address:

Please select one answer.

C3. Which stages would you like to be notified about:

The publication of the recommendations of Planning Inspector?

The adoption of the Local Plan?

Data Protection Act 1988 and Freedom of Information Act 2000

Representations cannot be treated in confidence. Please see the attached privacy notice. The Town and Country Planning (Local Planning) (England) Regulations 2012, requires copies of all representations to be made publically available, this will be done via the Council`s website. The Council will not publish personal information such as addresses, telephone numbers, or email addresses. By submitting a representation you confirm that you agree to this and accept responsibility for your representations.

Signature:

Sam Lake

Date:

16/02/2018

Please sign and date your representations.