

## Part B – Please use a separate sheet for each representation

Name or Organisation: Crest Nicholson Land and Partnerships

3. To which part of the Local Plan does this representation relate?

Core Policies

Paragraph	Policy	Policies Map
	Core Policy DCP1 – Delivering Carbon Neutral by 2030 (p.50)	

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	yes	No	
4.(2) Sound	Yes		No	no
4 (3) Complies with the Duty to co-operate	Yes	yes	No	

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The policy should acknowledge the current national planning policy provisions set out within the Climate Change Act 2008, the 2015 Written Ministerial Statement and reflected within NPPG (003 ID:6-003-20140612; 012 ID:6-012-20190315), pending replacement. It should also reflect the relevant provisions within the NPPF – Promoting Sustainable Transport (paragraphs 102-104). As drafted the policy is punitive rather than progressive in its approach and focuses particularly on the marginalisation of private car use when the correct approach is to prioritise and facilitate non-motorised forms of travel – walking and cycling, and public transport over private motorised transport, but to do so through positive planning. Opportunities to promote walking, cycling and public transport should be sought when plan-making, but there is no support for actively discouraging motorised modes of transport per se, because in certain instances it will not be feasible to do so. To require all new development to be designed in a way that discourages private car use is both unreasonable and unrealistic. (Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each 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.

The NPPF advocates the widening of choice and active management of patterns of growth so that travel demand is reduced; it does not include provisions that discourage the use of the private car, irrespective of fuel source. As worded the policy is out of step with the NPPF and is therefore not justified.

(Continue on a separate sheet /expand box if necessary)

**Please note** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

**After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.**

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

**No**, I do not wish to participate in hearing session(s)

 Yes

**Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To assist the Inspector regarding the preparation of a sound Local Plan.

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Signature:

Date:

21.7.21