

**Representor: FI Real Estate Management Ltd (FIREM)**

**Contact: Mr John Francis (Plan Red)**

**Representor ID: A31**

## **STATEMENT OF EVIDENCE (VERSION 2) – ERRATA SHEET**

Changes to statement of evidence as originally submitted are set out below. All are highlighted in accompanying revised statement of evidence:

Page 2 – at end of penultimate paragraph addition of the following sentence:

We say that in effect the CLAs were not in a position to meet the transitional provisions as it bypassed the second stage and moved straight to Reg 19 stage.

Page 7 – Under first paragraph under sub-heading Response to Question 1.12 rewording of text as follows:

The CLLP does not benefit from the transitional protections set out in paragraph 234 of the NPPF. In particular:

- **Paragraph 234(a)** requires that, to qualify for transitional treatment, a plan must have reached Regulation 19 (pre-submission) stage on or before 12 March 2025, and its draft housing requirement must meet at least 80% of local housing need.
- During the preparation of a local plan the authority must consult on a draft plan and take into account the representations received (Regulation 18). Despite indications to the contrary (that there would be two stages to Regulation 18) the CLA did not and could not have taken account of representations made at the Regulation 18 stage. This is because it did not proceed to the Part 2 stage and moved straight to Regulation 19 stage thus denying full consultation on the plan to meet the requirement. Put simply Regulation 19 version of the CLLP has to be regarded as incomplete.
- Submission of the Plan might have been done by the deadline but the date is academic because the critical stages as set out in the original LDS were not met.
- The CLLP **did not** reach Regulation 19 stage **30 June 2025** and therefore fails this test.
- **Paragraph 234(b)** requires submission for examination under Regulation 22 on or before 12 March 2025. The CLLP was **not submitted** by this date.

Beginning of page 8 rewording of opening paragraph as follows:

Accordingly, it is our case that the CLA has not complied with matters to enable it to fulfil the transitional criteria and as a consequence should be examined in full accordance with the **December 2024 NPPF**.