

IN4 - Appendix 2: Written Statement Guidance

All written statements must be prepared in accordance with this advice.

Any representor may submit a written statement or statements. However, these should only be in response to questions that relate to the representations that you made under regulation 20 (ie during the consultation held from 21 November 2023 to 26 January 2024). Statements should set out the key points from your representation against the relevant questions only, and not introduce new arguments.

Statements from representors should be concise and focussed, and in any event must contain no more than **3,000 words** for each Matter. If statements are longer than this, we may ask the Programme Officer to return them. Statements should also not include appendices or attachments.

The Council should produce a statement for every Matter. These should also be focused and succinct. However, because the Council should answer every question, it may be necessary to exceed the limit of 3,000 words per Matter in some cases.

However, it may be that the Council's response to our preliminary questions may suffice. If the Council has nothing to add on a particular point, then it will be acceptable to provide a cross-reference to the relevant response to IN2 or IN3. Similarly, if the Council consider the issue is fully addressed within a specific part of the evidence base, for example a Topic Paper, then a summary or cross-reference to the relevant passage will also be acceptable.

The same advice is given to representers; cross-references to specific parts of original representations, or short summaries of the content, are likely to be sufficient.

There is no need for any party to repeat in detail anything which is already before us – a summary or cross-reference is preferable. Similarly, there is no absolute requirement for representors to submit additional written statements if there is nothing to add to what was in the original representation. Not submitting a written statement does not preclude those who have a right to speak from attending the hearing.

A separate statement must be submitted for each Matter that contains a question or questions that you wish to respond to. Each statement must:

- Include your name and Matter number in the top right corner of each page.
- Answer each question that you wish to respond to separately with clear reference to the relevant question number.
- Include a word count at the bottom of the final page.
- Have no appendices attached.

Where appropriate, reference should be made to relevant parts of the National Planning Policy Framework (NPPF) and associated Planning Practice Guidance (PPG) (eg ID:61-002-20190315) with an explanation of why you think the policy in question is consistent or inconsistent with it. As set out in our initial letter to the

Council, unless otherwise indicated, the Plan will be considered against the September 2023 version of the NPPF.

Reference should also be made to specific parts of evidence in the examination library and any documents submitted by representors with their regulation 20 representations. The document reference, title, page and paragraph number should be stated.

There is no need to quote extensive parts of the NPPF, PPG or evidence documents, although a brief extract or summary of key factual information from evidence in the examination library may be included if it is directly relevant to one of our questions.

Written statements are not the opportunity to introduce new evidence. If the Council or any representor considers that there is evidence that it is essential to refer to answer one of our questions, but which is not in the examination library, please check with the Programme Officer before submitting it. If, exceptionally, we agree to accept additional evidence, for example because it has only become available since the Plan was submitted and it is essential for us to consider, it will be added to the examination library.

If your response to any of our questions concludes that the relevant part of the Plan is not sound, your statement should set out how you think it should be modified to ensure that it is. Where relevant, refer to any proposed modifications or changes to the Policies Map that have been proposed by the Council.

Artificial Intelligence

As set out in Version 2 of our Guidance Note (IN1), it is understood that Artificial Intelligence could be used to support the process. However, if Artificial Intelligence is to be used, such as in the writing of documents, or creation of plans and images, this should be declared when the information is submitted. Such a declaration should include what systems or tools you have used, the source of the information that the AI system has based its content on, and what information or material the AI has been used to create or alter. Further guidance can be found [here](#).

Deadlines

As set out in the main letter, deadlines for sending written statements to the Programme Officer are:

- Hearing statements for weeks 1-3: **5pm on 7th February 2025**
- Hearing statements for weeks 4-7: **5pm on 7th March 2025**

Paper copies of the statements are not necessary, though are acceptable if it is not possible to provide electronic versions via email. Please contact the Programme Officer if this is the case.