

IN2: 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 made under Regulation 20 (ie during the consultation held from March to May 2024). Statements should set out the key points from your representation against the relevant questions, 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, I may ask the Programme Officer to return them.

The Council should produce a statement for every Matter. These should also be focused and succinct. As the Council has to answer every question, it may be necessary to exceed the limit of 3,000-word limit. In many cases, it may be that the Council's response to my Preliminary Questions will suffice. If the Council has nothing to add on particular question, then it will be acceptable to simply provide a cross-reference to the relevant response to IN1. 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 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 me – 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.

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 appendices are attached, I may ask the Programme Officer to return them.

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. There should be no need to quote extensive parts of the NPPF, PPG or evidence documents.

As noted above, 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.

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](#).

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

Where several people or organisations wish to speak on the same issue, Representors should consider producing a single joint paper.

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 make it sound. Where relevant, refer to any proposed modifications or changes to the Policies Map that have been proposed by the Council.

Written statements should be sent to the Programme Officer by **8 January 2025**. Hard copies of the statements are not necessary, though are acceptable if it is not possible to provide electronic versions via email.

Any queries about written statements should be passed onto the Programme Officer.