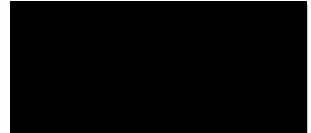
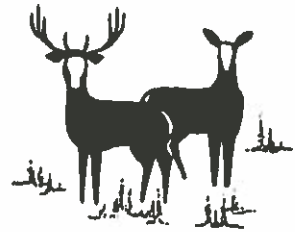


**Theydon Bois and District  
Rural Preservation Society**  
*Affiliated to the Campaign to Protect Rural England*

*Registered Charity No. 286364  
Established 1943*



Planning Policy  
Epping Forest District Council  
Civic Offices, 323 High Street  
EPPING  
Essex CM16 4BZ

28<sup>th</sup> January 2018

Dear Sir or Madam,

**Representation form for Submission Version of the Epping Forest District Local Plan 2011-2033  
(Regulation 19 publication)**

Please find attached the Society's representations on the completed 'Representation Form for the Submission Version of the Epping Forest District Local Plan 2011-2033 (Regulation 19 publication).

The Theydon Bois and District Rural Preservation Society has approximately 1,700 individual members in a majority of the homes in Theydon Bois. (Membership can be verified by our subscription books). The Society's Executive Committee meeting on 11 Jan. 2018 agreed that a submission should be made to this consultation.

This is being sent by email and also in the form of a hard copy that will be delivered to the EFDC Offices prior to the deadline of 5 .00pm on 29<sup>th</sup> January.

In completing the supplied form, while there is a requirement to indicate if the sections of the document commented upon are unsound for one or more of 5 indicated categories (there is no alternative) we wish to make it clear that we do not wish to find the Plan as a whole, or the whole of a section unsound as such. Nor do we wish to unduly delay the publication of the plan. What we are respectfully suggesting to the Inspector is that the plan should be modified to incorporate the changes we suggest as we believe that these changes will improve the clarity, guidance and effectiveness of the document.

Yours faithfully,

Mr J Watts,  
Secretary.

## Representation form for Submission Version of the Epping Forest District Local Plan 2011-2033 (Regulation 19 publication)

This form should be used to make representations on the Submission Version of the Epping Forest District Local Plan which has been published. Please complete and return by 29 January 2018 at 5pm. An electronic version of the form is available at <http://www.efdclocalplan.org/>

**Please refer to the guidance notes available before completing this form.**

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Please return any representations to: Planning Policy, Epping Forest District Council, Civic Offices, 323 High Street, Epping, Essex, CM16 4BZ  
Or email them to: [LDFconsult@eppingforestdc.gov.uk](mailto:LDFconsult@eppingforestdc.gov.uk)  
**BY 5pm on 29 January 2018**

---

This form has two parts –

Part A – Personal Details

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

***Please attach any documents you wish to submit with your representation***

---

### Part A

- a) Resident or Member of the General Public or
- b) Statutory Consultee, Local Authority or Town and Parish Council or
- c) Landowner or
- d) Agent

Other organisation (please specify):

**Theydon Bois and District Rural Preservation Society**

The Theydon Bois and District Rural Preservation Society has approximately 1,700 individual members in a majority of the homes in Theydon Bois. (Membership can be verified by our subscription books). The Society's Executive Committee meeting on 11 Jan. 2018 agreed that a submission should be made to this consultation.

### 2. Personal Details

Title : Mr

First Name : James

Last Name : Watts

Job Title (where relevant): TB&DRPS Secretary

Organisation (where relevant): Theydon Bois and District Rural Preservation Society

Address Line 1: [REDACTED]

Line 2: [REDACTED]

Line 3: [REDACTED]

Line 4: [REDACTED]

Post Code : [REDACTED]

Telephone Number : [REDACTED]

E-mail Address: [REDACTED]

---

**Part B – If necessary please complete a separate Part B form for each representation**

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4. To which part of the Submission Version of the Local Plan does this representation relate? (Please specify where appropriate)

Paragraph :

Policy :

Policies Map :

Site Reference : **THYB.R1 Land at Forest Drive**

Settlement : **Theydon Bois**

5. Do you consider this part of the Submission Version of the Local Plan:

\*Please refer to the Guidance notes for an explanation of terms

a) Is Legally compliant Yes:      No:

b) Sound      Yes:      No: /

If no, then which of the soundness test(s) does it fail\*

Positively prepared: /

Effective : /

Justified:

Consistent with national policy:

c) Complies with the duty to co-operate      Yes:      No:

6. Please give details of why you consider the Submission Version of the Local Plan is not legally compliant, 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, soundness of the Local Plan or compliance with the duty to co-operate, please also use this box to set out your comments:

**Comments Here:**

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**The Guidance Notes in Appendix -6e are lacking in certain aspects of Development Guidance.**

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7. Please set out what change(s) you consider necessary to make the Submission Version of the Local Plan legally compliant or sound, having regard to the test you have identified in the question above (Positively prepared/Justified/Effective/Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the Submission Version of 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.

#### **Comments Here:**

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**Further guidance should be given under guidance with regard to ‘Flood Risk’ at this site. “Consideration of the surface water flooding should not only be considered on the site and its immediate surroundings, but also with regard to the potential exacerbation of the present runoff from the forest land over the hard surfaces causing flooding downhill from this site in the vicinity of the Bull Public House at the junction of Coppice Row and Forest Drive. Improvements in the capacity of infrastructure at this location may be required to meet Policy D3 Utilities.”**

#### **Evidence:**

**Low level flooding caused by runoff from Epping Forest and its buffer lands is already a regular problem at the location noted above and was documented in our submission to the Draft Plan consultation (31 October 2016 - 12 December 2016) which noted there was large scale flooding at this location in 1982 ref: <http://www.theydon.org.uk/Flooding%20in%20Theydon%20Bois/default.htm>**

---

**Further guidance should be given under guidance with regard to Landscape Character. “The site is located in an area of high landscape sensitivity. Development proposals should be carefully designed to minimise harm to the wider landscape taking into account the development’s setting in the landscape and the local landscape character. The design should minimise the impact on landscape character by considering factors including the design, layout, materials and external finishes. The development’s landscaping should seek to incorporate, retain and, where possible, restore/enhance existing hedgerows and tree belts, providing additional screening from the wider landscape to mitigate visual harm.”**

---

**Further guidance should be given under guidance with regard to ‘On Site Restraints’ with regard to the trees on this site. “Design, layout and development proposals should aim to preserve and protect as far as possible the trees within the site and on the site boundaries”.**

---

**Further guidance should be given under guidance with regard to “Dark Skies”. “Dark Skies”:**

**Development proposals should be carefully designed to minimise harmful light pollution. Street lighting will not be permitted within this development. This is in line with the ‘Theydon Bois Dark Skies Policy’ as outlined in the Theydon Bois Village Design Statement.”**

---

**Evidence:**

**Although Theydon Bois Village Design Statement has not been adopted by EFDC as a 'Supplementary Planning Document' it has been used by EFDC Planning Officers and Councillors in determining Planning Applications, especially with regard to the 'Dark Skies Policy'.**

---

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

**No**, I do not wish to participate: **No**

Yes, I wish to participate

at the hearings:

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**Continues on page below.**

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**Part B – If necessary please complete a separate Part B form for each representation**

4. To which part of the Submission Version of the Local Plan does this representation relate?

(Please specify where appropriate)

Paragraph :

Policy :

Policies Map :

Site Reference : **THYB.R2 Theydon Bois London Underground Car Park**

Settlement : **Theydon Bois**

5. Do you consider this part of the Submission Version of the Local Plan:

\*Please refer to the Guidance notes for an explanation of terms

a) Is Legally compliant Yes: No:

b) Sound: Yes: **No /**

If no, then which of the soundness test(s) does it fail\*

Positively prepared: **/**

Effective : **/**

Justified:

Consistent with national policy:

c) Complies with the duty to co-operate Yes: No:

6. Please give details of why you consider the Submission Version of the Local Plan is not legally compliant, 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, soundness of the Local Plan or compliance with the duty to co-operate, please also use this box to set out your comments:

**Comments Here:**

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**The Guidance Notes in Appendix -6e are lacking in certain aspects of Development Guidance.**

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7. Please set out what change(s) you consider necessary to make the Submission Version of the Local Plan legally compliant or sound, having regard to the test you have identified in the question above (Positively prepared/Justified/Effective/Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the Submission Version of 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.

**Comments Here:**

---

**Further guidance should be given under guidance with regard to ‘Flood Risk’ at this site. “Consideration of the surface water flooding should not only be considered on the site and its immediate surroundings, but also with regard to potential runoff causing flooding downhill from this site in the vicinity of the Bull Public House at the junction of Coppice Row and Forest Drive”.**

**Evidence:**

**Low level flooding caused by runoff is already a regular problem at this location and as documented in our submission to the Draft Plan consultation (31 October 2016 - 12 December 2016) there was large scale flooding at this location in 1982 ref: <http://www.theydon.org.uk/Flooding%20in%20Theydon%20Bois/default.htm>**

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**Further guidance should be given under guidance with regard to ‘Heritage’. In addition to the Grade II listed Bull Public House, “Development of the site may impact upon the setting of the Station House and related structures including the ‘Iron Footbridge’ between platforms. This Station House and related structures date from the arrival of the railway in 1865 and development proposals should sustain or enhance their setting.”**

**Evidence:**

**Although the building and footbridge are not grade II listed or on the EFDC Local List they are of historical importance and all similar period station buildings along this rail line within the Epping Forest District are listed.**

---

**Further guidance should be given under guidance with regard to “Dark Skies”. “Dark Skies:**

**Development proposals should be carefully designed to minimise harmful light pollution. Street lighting will not be permitted within this development. This is in line with the ‘Theydon Bois Dark Skies Policy’ as outlined in the Theydon Bois Village Design Statement.”**

**Evidence:**

**Although Theydon Bois Village Design Statement has not been adopted by EFDC as a ‘Supplementary Planning Document’ it has been used by EFDC Planning Officers and Councillors in determining Planning Applications, especially with regard to the ‘Dark Skies Policy’.**

---

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate: **No**

Yes, I wish to participate  
at the hearings:

9. If you wish to participate at the hearings, please outline why you consider this to be necessary:

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*Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination*

**Continues on page below.**



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**Part B – If necessary please complete a separate Part B form for each representation**

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4. To which part of the Submission Version of the Local Plan does this representation relate?

(Please specify where appropriate)

Paragraph :

Policy :

Policies Map :

Site Reference : **THYB.R3 Land at Coppice Row**

Settlement : **Theydon Bois**

5. Do you consider this part of the Submission Version of the Local Plan:

\*Please refer to the Guidance notes for an explanation of terms

a) Is Legally compliant Yes:      No:

b) Sound:      Yes:      No: /

If no, then which of the soundness test(s) does it fail\*

Positively prepared: /

Effective : /

Justified:

Consistent with national policy:

c) Complies with the duty to co-operate      Yes:      No: /

6. Please give details of why you consider the Submission Version of the Local Plan is not legally compliant, 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, soundness of the Local Plan or compliance with the duty to co-operate, please also use this box to set out your comments:

**Comments Here:**

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**This site was not identified in the original Issues and Options document or included in the Draft Local Plan Consultation (31 October 2016 - 12 December 2016) and therefore we were not able to comment on the suitability or restraints of this site for development**

**The Guidance Notes in Appendix -6e are lacking in certain aspects of Development Guidance.**

7. Please set out what change(s) you consider necessary to make the Submission Version of the Local Plan legally compliant or sound, having regard to the test you have identified in the question above (Positively prepared/Justified/Effective/Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the Submission Version of 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.

**Comments Here:**

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**Further guidance should be given under guidance with regard to 'Heritage'.  
"Development of the site may impact upon the setting of a number of Grade II and EFDC Locally listed buildings that are close to the site and surround the Village Green. This site also falls within a proposed, but not yet adopted Conservation Area. Development proposals should preserve the special architectural or historic interest of these Listed Buildings and their settings through high quality design/materials".**

---

**Further guidance should be given under guidance with regard to 'Design'.  
"Development proposals for this site should be considered and informed by the Quality Review Panel. The site on Coppice Row opposite the Village Green is clearly visible from a large part of the village. Design, layout and development proposals should be sympathetic to and enhance and contribute to the setting."**

**Evidence: Our Society and our Parish Council spent considerable time in discussion with the developers of Pavilion Court on the opposite corner of Orchard Drive to ensure a sympathetic development. This should be recorded in the EFDC Planning Officers report on this application.**

---

**Further guidance should be given under guidance with regard to 'Green Belt'.  
"The site is opposite Theydon Bois Village Green that is both part of Epping Forest and within the Green Belt. Any development should contribute to and enhance this Green Belt setting".**

**Further guidance should be given under guidance with regard to "Dark Skies".  
"Dark Skies:  
The site on Coppice Row opposite the Village Green is clearly visible from a large part of the village. Development proposals should be carefully designed to minimise harmful light pollution. This is in line with the 'Theydon Bois Dark Skies Policy' as outlined in the Theydon Bois Village Design Statement."**

**Evidence:  
Although Theydon Bois Village Design Statement has not been adopted by EFDC as a 'Supplementary Planning Document' it has been used by EFDC Planning Officers and Councillors in determining Planning Applications, especially with regard to the 'Dark Skies Policy'.**

---

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate: **No**

Yes, I wish to participate  
at the hearings:

9. If you wish to participate at the hearings, please outline why you consider this to be necessary:

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*Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination*

**Continues on page below.**

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**Part B – If necessary please complete a separate Part B form for each representation**

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4. To which part of the Submission Version of the Local Plan does this representation relate?

(Please specify where appropriate)

Paragraph : **Housing 3.5**

Policy : **Policy H 1 Housing Mix and Accommodation Types**

Policies Map :

Site Reference :

Settlement :

5. Do you consider this part of the Submission Version of the Local Plan:

\*Please refer to the Guidance notes for an explanation of terms

a) Is Legally compliant Yes: No:

b) Sound: Yes: No: /

If no, then which of the soundness test(s) does it fail\*

Positively prepared:

Effective : /

Justified:

Consistent with national policy:

c) Complies with the duty to co-operate Yes: No:

6. Please give details of why you consider the Submission Version of the Local Plan is not legally compliant, 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, soundness of the Local Plan or compliance with the duty to co-operate, please also use this box to set out your comments:

**Comments Here:**

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**While paragraph 3.5 notes the importance of bungalows and their gradual erosion it gives no indication as to how this continuing ‘erosion’ can be monitored and prevented. There is no section in Policy H1 that helps to restore the balance in the housing mix caused by the ‘erosion’ of bungalows.**

---

**Policy H1 while recognising the need for a range of house types and sizes to address local need, including for ‘down-sizing’, it does not include any policy on**

**the prevention of inappropriate extensions that will progressively erode the smaller type of properties that allow ‘down-sizing’.**

7. Please set out what change(s) you consider necessary to make the Submission Version of the Local Plan legally compliant or sound, having regard to the test you have identified in the question above (Positively prepared/Justified/Effective/Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the Submission Version of 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.

**Comments Here:**

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**We suggest that paragraph 3.5 or the addition of a further paragraph contains a section that indicates how the housing mix will be monitored with regard to Bungalows & small properties.**

**“A core planning principle in the NPPF is that every effort should be made objectively to identify and then meet the housing needs of an area. The Council will carry out a monitoring procedure with regard to the number of Bungalows and Small Houses that have the potential for ease of adaptation such that they can provide choice for people with accessibility needs, including the current and future needs of older people who wish to ‘down-size’. This is to ensure a suitable mix of housing is ongoing. The monitoring will be based on individual Town or Parish catchments within the District to ensure that any particular neighbourhoods are not disproportionately affected by a change to the housing mix. The maximum time between monitoring periods will be 5 years.”**

**“The Council will favour the development of Bungalows and appropriate smaller houses over larger dwellings in areas where it has already identified a significant erosion of this type of dwelling.”**

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**Policy H1 should include a section on the prevention of inappropriate extensions that will progressively erode the smaller type of properties that allow ‘down-sizing’. We suggest that a wording based on previous Local Plan (2006) policy H4A replaces A (i) in this new policy.**

**“The Council will require that provision is made for a range of dwellings, including an appropriate proportion of smaller dwellings, to meet identified housing need on a site-by-site basis. This mix should be reflected in both market housing and affordable housing and the need for down-sizing. When considering extensions to, conversions or amalgamations of, existing dwellings, needs identified in any monitoring will be considered to ensure that an adequate mix of dwellings is maintained. The Council may therefore refuse planning permission for extensions to, or conversions of, existing dwellings where the result will adversely affect the range and mix of dwellings available”.**

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate: **No**

Yes, I wish to participate  
at the hearings:

9. If you wish to participate at the hearings, please outline why you consider this to be necessary:

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*Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination*

**Continues on page below.**

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**Part B – If necessary please complete a separate Part B form for each representation**

---

4. To which part of the Submission Version of the Local Plan does this representation relate?

(Please specify where appropriate)

Paragraph : **Green Belt and Development paragraph 4.34**

Policy : **DM4 Green Belt**

Policies Map :

Site Reference :

Settlement :

5. Do you consider this part of the Submission Version of the Local Plan:

\*Please refer to the Guidance notes for an explanation of terms

a) Is Legally compliant Yes: No:

b) Sound Yes: No: /

If no, then which of the soundness test(s) does it fail\*

Positively prepared:

Effective : /

Justified:

Consistent with national policy:

c) Complies with the duty to co-operate Yes: No:

6. Please give details of why you consider the Submission Version of the Local Plan is not legally compliant, 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, soundness of the Local Plan or compliance with the duty to co-operate, please also use this box to set out your comments:

**Comments Here:**

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**We do not agree with the assumptions made in paragraph 4.34 where the Council opinion is that it would not be in compliance with national policy to define specific rules for development in the Green Belt beyond those contained in Policy DM 4. We are of the opinion that this paragraph should be deleted with the exception of the definition of limited infilling. While it is clear that Local Plan Policies should be compliant with the NPPF (in this case paragraphs 79 – 92) there is no need to restate these, which is what effectively Policy DM4 is doing**

with only minor variations of the wording. EFDC's guidance notes already state "The preparation of the Local Plan has regard to all policies in the National Planning Policy Framework". The local plan is a strategic document that should be able to provide clarity, certainty and understanding to developers, residents and community groups alike through the inclusion of detailed development management policies.

What the Local Plan should be doing here is offering 'Guidance' either in the form of Specific Policies or Guidance Notes for the use of Planning Officers, Developers, Planning Applicants, Parish Councils and Local interest Groups (such as ourselves) as to, while remaining compliant with the NPPF, how the NPPF paragraphs are likely to be interpreted with respect to the Epping Forest District and local characteristics. This is what previous Local Plan (2006) policies GB2A to GB17B, while not perfect, attempted to accomplish with some success. In numerous appeals that have gone to the Planning Inspectorate over the years these policies were deemed to be compliant with the NPPF and were often quoted in Inspector's decisions on appeals. The detail allowed the Councilors and / or the Planning Inspectorate to better judge the appropriateness of any Planning Applications or Appeals before them.

We have viewed a number of other LPA's New Local Plans with regard to Green Belt Policies that have been or are being submitted for Regulation 22 and most take the view that it is compliant with the NPPF and advisable to add Policies or offer Guidance to the Green Belt sections of their Local Plan. Including such Policies or Guidance is likely to reduce the number planning applications where the NPPF has been misinterpreted or misunderstood with regard to local circumstances; it will reduce the number of appeals or reapplications and therefore speed up the planning process.

---

7. Please set out what change(s) you consider necessary to make the Submission Version of the Local Plan legally compliant or sound, having regard to the test you have identified in the question above (Positively prepared/Justified/Effective/Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the Submission Version of 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.

**Comments Here:**

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We are of the opinion that the new Local Plan Policy DM4 Green Belt should be changed or replaced to include the following as Policies or added as Guidance to the interpretation of the NPPF taking into account the District's Characteristics.

The definition of "limited infilling" in paragraph 4.35 should be retained and moved as appropriate to fit within any changes.

**"Development in the Green Belt:**

1. The Metropolitan Green Belt boundaries within Epping Forest District will be maintained in order to continue to serve its key function, and be protected from inappropriate development, and to:



- (i). Preserve the Districts special character and landscape setting;
- (ii). Check the growth of London and prevent ribbon development and urban sprawl;
- (iii). Prevent the coalescence of settlements;
- (iv). Assist in safeguarding the countryside from encroachment; and
- (v). Assist in urban brownfield land reuse, by encouraging the recycling of derelict and other urban land."

2. "Development proposals within the Green Belt will be assessed in accordance with national policy and guidance. Development within the Green Belt will only be permitted if it maintains the Green Belt's openness and does not conflict with the purposes of the Green Belt or harm its visual Amenities". Development maybe permitted within the Green Belt if evidence of very special circumstances is demonstrated".

3. "New developments and the enlargement of developments within the Green Belt will be regarded as inappropriate with the exceptions that are indicated in the NPPF. In assessing proposals for new development or extensions in the Green Belt the Council will have regard to the objective of maintaining the openness, function and permanence of the Green Belt and:

- (i). the protection of the general character and appearance of the rural area;
- (ii). the need to preserve or enhance existing landscape and ecological features;
- (iii). the effect of the proposal on public rights of way."

4. "Proposals for small scale buildings and facilities required for outdoor sport and recreation will need to demonstrate a justifiable need for such buildings and facilities. Any ancillary social facilities provided as part of the development should be incidental to the primary use of the site and restricted to a size appropriate to the primary use only."

---

**"Replacement Dwellings in the Green Belt:**

The replacement of existing buildings may be permitted in exceptional circumstances provided that;

- (i). the visual dominance of the new building does not exceed that of the existing buildings and the proposal would not lead to an expansion or intensification of activity on the site;
- (ii). the existing dwelling is lawful, permanent, designed and originally constructed for residential use;
- (iii). a substantial and readily identifiable part of the original dwelling remains in place;
- (iv). the total size of the dwelling (including conservatories and basements that are partially above or below ground level) does not exceed the original size, height, volume or floor area by a disproportionate amount. (15% increase in volume is a suggested acceptable maximum provided all other conditions are met);
- (v). the design of the extension is appropriate to the host building and its setting and does not detract from the purposes or openness of the Green Belt;
- (vi). where appropriate, a condition will be imposed to prevent further extension of the dwelling by the removal of permitted development rights;

(vii). where the original, existing dwelling is a bungalow it should be replaced by a bungalow.”

**“Residential Curtilages:**

(i).The extension of a domestic curtilage into the Green Belt will only be permitted if very exceptional circumstances are demonstrated. It will not be permitted if the extension or its use detracts from the openness or function of the Green Belt or causes the expansion or intensification of activity on the site.”

**“Residential Extensions:**

The replacement of existing permanent dwellings in the Green Belt, on a one for one basis, may be permitted with regard to the following:

- (i) any replacement dwelling will be expected to be located in the position of the existing dwelling except where the Council considers an alternative siting to be more appropriate in Green Belt or amenity terms;
- (ii). the total size of the dwelling (including conservatories and basements that are partially above or below ground level) does not exceed the original size, height, volume or floor area by a disproportionate amount. (An increase of 40% of floor space to a maximum of 50m<sup>2</sup> is suggested as an acceptable maximum provided all other conditions are met);
- (iii). not result in the size of the private or cultivated garden of the replacement dwelling exceeding that which it replaces;
- (iv). where the existing dwelling has already been extended, permitted development rights on the new dwelling will be removed to prevent further extensions or outbuildings.

---

**NB.** The references to “original” with regard to dwellings in the Green Belt means; the dwelling as existing on 1<sup>st</sup> July 1948 even if the original dwelling has since been replaced. Where no dwelling existed on the date then “original” means the dwelling as first built.”

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8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

**No**, I do not wish to participate: /

**Yes**, I wish to participate  
at the hearings:

9. If you wish to participate at the hearings, please outline why you consider this to be necessary:

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*Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination*

**Continues on page below.**

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**Part B – If necessary please complete a separate Part B form for each representation**

4. To which part of the Submission Version of the Local Plan does this representation relate?

(Please specify where appropriate)

Paragraph : **4.59 Heritage Assets**

Policy : **DM7**

Policies Map :

Site Reference :

Settlement :

5. Do you consider this part of the Submission Version of the Local Plan:

\*Please refer to the Guidance notes for an explanation of terms

a) Is Legally compliant Yes: No:

b) Sound Yes: No: /

If no, then which of the soundness test(s) does it fail\*

Positively prepared:

Effective : /

Justified:

Consistent with national policy:

c) Complies with the duty to co-operate Yes: No:

6. Please give details of why you consider the Submission Version of the Local Plan is not legally compliant, 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, soundness of the Local Plan or compliance with the duty to co-operate, please also use this box to set out your comments:

**Comments Here:**

**Paragraph 4.59 or Policy DM7 do not include any reference to ‘Protected Lanes’ although these are referred to in the Evidence Base Document (“Epping Forest District Historic Characterisation Study (Essex County Council, 2015”).**

7. Please set out what change(s) you consider necessary to make the Submission Version of the Local Plan legally compliant or sound, having regard to the test you have identified in the question above (Positively prepared/Justified/Effective/Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the Submission Version of 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.

**Comments Here:**

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**We suggest that 'Protected Lanes' be specifically included in paragraph 4.59 under 'non designate' assets along with "assets such as locally listed buildings and structures (such as monuments and memorials)"**

**We suggest that a new paragraph is inserted in Policy DM7 between C and D and subsequent paragraphs are renumbered.**

**"Development proposals that generate significant amounts of traffic movement in Protected Lanes or have a severe impact on Heritage assets will not be permitted"**

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8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate:

Yes, I wish to participate  
at the hearings:

9. If you wish to participate at the hearings, please outline why you consider this to be necessary:

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*Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.*

**Continues on page below.**

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**Part B – If necessary please complete a separate Part B form for each representation**

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4. To which part of the Submission Version of the Local Plan does this representation relate?

(Please specify where appropriate)

Paragraph : **Sustainable Transport Corridors 3.90**

Policy : **Policy T1 Sustainable Transport Choices**

Policies Map :

Site Reference :

Settlement :

5. Do you consider this part of the Submission Version of the Local Plan:

\*Please refer to the Guidance notes for an explanation of terms

a) Is Legally compliant Yes: No:

b) Sound Yes: No: /

If no, then which of the soundness test(s) does it fail\*

Positively prepared:

Effective : /

Justified:

Consistent with national policy:

c) Complies with the duty to co-operate Yes: No:

6. Please give details of why you consider the Submission Version of the Local Plan is not legally compliant, 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, soundness of the Local Plan or compliance with the duty to co-operate, please also use this box to set out your comments:

**Comments Here:**

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**There is no guidance or policy with regard to 'Quiet Lanes' in line with the Department for Transport – Traffic Advisory Leaflet 3/04 and The Quiet Lanes and Home Zones Regulations 2006 (circular 02/2006).**

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7. Please set out what change(s) you consider necessary to make the Submission Version of the Local Plan legally compliant or sound, having regard to the test you have identified in the question above (Positively prepared/Justified/Effective/Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the Submission Version of 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.

**Comments Here:**

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**We suggest that a new paragraph is included after paragraph 3.90 and subsequent paragraphs renumbered.**

**“The Council with the community’s involvement and in partnership with relevant stakeholders will seek to promote ‘Quiet Lanes’. The aim of ‘Quiet Lanes’ is to maintain the character of minor rural roads by seeking to contain rising traffic growth that is widespread in our rural areas. ‘Quiet Lanes’ are a positive way of providing a chance for people to walk, cycle and horse ride in a safer environment; widen transport choice; and protect the character and tranquillity of country lanes.”**

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8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate: ✓

Yes, I wish to participate  
at the hearings:

9. If you wish to participate at the hearings, please outline why you consider this to be necessary:

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*Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.*

**Continues on page below.**

10. Please let us know if you wish to be notified when the Epping Forest District Local Plan is submitted for independent examination:

Yes: /

No.:

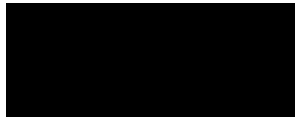
11. Have you attached any documents with this representation?

Yes:

No: /

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Signature:



Date:

28<sup>th</sup> January 2018