



Representation form: Consultation on the Main Modifications to the emerging Local Plan

This form should be used to make representations on the Main Modifications to the Epping Forest District Local Plan Submission Version 2017 to the Local Plan Inspector. The Main Modifications Schedule, online response form and all required supporting documentation can be accessed via the Examination website at www.efdclocalplan.org. Please complete and return representations by Thursday 23rd September 2021 at 5pm.

Please note, the content of your representation including your name will be published online and included in public reports and documents.

It is important that you refer to the [guidance notes](#) on the Examination website before completing this form.

The quickest and easiest way to make representations is via the online response form at www.efdclocalplan.org.

If you need to use this downloadable version of the form please email any representations to MMCons@eppingforestdc.gov.uk

Or post to: MM Consultation 2021, Planning Policy, Epping Forest District Council, Civic Offices, 323 High Street, Epping, Essex, CM16 4BZ

By 5pm on Thursday 23rd September 2021

This form is in two parts:

Part A – Your Details

Part B – Your representation(s) on the Main Modifications and/or supporting documents. Please fill in a separate Part B for each representation you wish to make.

The Main Modifications Schedule and supporting documents to the Main Modifications can be accessed online at www.efdclocalplan.org. The supporting documents to the Main Modifications are listed below. Representations concerning their content will be accepted to the extent that they are relevant to inform your comments on the Main Modifications. However, you should avoid lengthy comments on the evidence/background documents themselves.

- A. Council's response to Actions outlined in Inspector's post examination hearing advice (Examination document reference number ED98), July 2021 (ED133)

- B. Sustainability Appraisal Report Addendum, June 2021 (June 2021) (ED128/ EB210)
- C. 2021 Habitats Regulations Assessment, June 2021 (ED129A-B/EB211A-B)
- D. Epping Forest Interim Air Pollution Mitigation Strategy, December 2020 (ED126/ EB212)
- E. EFDC response to Inspector's Post Hearing Action 5 and supplementary questions of 16 June 2021, July 2021 (ED127)
- F. Epping Forest District Council Green Infrastructure Strategy (ED124A-G/ EB159A-G)
- G. Harlow and Gilston Garden Town Latton Priory Access Strategy Assessment Report, July 2020 (ED121A-C/EB1420A-C)
- H. Revised Appendix 2 to the Epping Forest District Council Open Space Strategy (EB703), July 2021 (ED125/EB703A)
- I. IDP: Part B Infrastructure Delivery Schedule 2020 Update (ED117/EB1118)
- J. EFDC Consolidated and Updated Viability Evidence 2020 (ED116/ EB1117) Consolidated
- K. Statement of Common Ground Addendum East of Harlow, September 2020 (ED122A-B)
- L. South Epping Masterplan Area Capacity Analysis (Sites EPP.R1 and EPP.R2), March 2020 (ED120/ EB1421)
- M. In addition to the above there are a number of Examination Documents, which include Homework Notes produced by the Council as a result of actions identified by the Inspector at the hearing sessions as well correspondence between the Council and the Inspector following hearings. These Examination Documents can all be accessed on the [Local Plan website](#).

Please only attach documents essential to support your representation. You do not need to attach representations you have made at previous stages.

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Part A – Your Details

1. Are you making this representation as? (Please tick as appropriate)

- 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

2. Personal Details

3. Agent's Details (if applicable)

Title	Mr	
First Name	JAMES	
Last Name	WATTS	
Job Title (where relevant)	N/A	
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]	

Introduction:

The Theydon Bois and District Rural Preservation Society was founded in 1943 to preserve the rural character of the countryside in and around Theydon Bois as an appropriate and natural complement to Epping Forest, the objectives of the society are:

- To resist all attempts of encroachment on the Green Belt.
- To preserve all public footpaths and right-of-way.
- To do such other things as may be incidental or conducive to the maintenance of local amenities.

The 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 responded to the consultation on the Submission Version of the New 'Epping Forest District Local Plan (2011-2033)' in January 2018. Although we found no reason why the Plan should be found unsound we did suggest some further Guidance was needed by amendments and modifications with regard to the specific allocated sites in Theydon Bois and to policies that would potentially impact on our village and surrounding environment. Members of our committee attended many of the hearing sessions as observers.

EFDC should have our original 2018 comments and supplied evidence on record or they can be accessed directly from this link:

<http://www.theydon.org.uk/Issues%20and%20Options%20Consultation/Downloads/TBDRPS%20Representation%20-%20Submission%20Local%20Plan%20-%20Web.pdf>

With regard to this latest consultation on the Main Modifications we did not find the online response form particularly user friendly so our responses have been made on this downloaded EFDC response form and are as below. We will submit this by email and also deliver a properly signed hard copy to the EFDC offices.

Continues on next page

Part B – Your representation on the Main Modifications and/or supporting documents

If you wish to make more than one representation, please complete a separate [Part B form](#) for each representation

4. Which **Main Modification number and/or supporting document** does your representation relate to? (Each Main Modification within the Schedule has a reference number. This can be found in the first column i.e. MM1, MM2 and each Supporting Document has a reference number beginning with ED).

Any representation on a supporting document should clearly state (in question 6) which paragraphs of the document it relates to and, as far as possible, your comments should be linked to specific Main Modifications. You should avoid lengthy comments on the supporting documents themselves.

MM no.

Supporting document reference

5. Do you consider this **Main Modification and/or supporting document**:
(Please refer to the Guidance notes for an explanation of terms)

- a) Is Legally compliant Yes No
- b) Sound Yes No

Positively prepared NO

Effective NO

6. Please give details of why you consider the Main Modification and/or supporting document is not legally compliant or is unsound. 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.

While the Society welcomed the amended Vision for the District in MM8 paragraphs (i) – (x) and these amendments have our support and we are hopeful that this Vision will be fully implemented in policies.

We did make though make specific comments with regard to Policy H1 – Paragraph 3.5 in regard to the Housing Mix where we were concerned that any monitoring at present being used was failing to identify specific areas of our District with particular needs in regard population profiles, smaller homes and downsizing that paragraph 3.3 does not fully address. Without a robust and detailed monitoring procedure we believe that areas in the district such as Theydon Bois, that has an age profile higher than the district average and that has already seen a substantial loss of Bungalows and Smaller Dwellings due to development, will continue to be disproportionately affected by the change in the housing mix. We therefore still suggest an amendment to Paragraph 3.5 or an additional Paragraph as below.

(Continue on a separate sheet if necessary)

7. Please set out what change(s) you consider necessary to make the **Main Modification and/or supporting document** 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.

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 on-going. 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

Part B – Your representation on the Main Modifications and/or supporting documents

If you wish to make more than one representation, please complete a separate Part B form for each representation

4. Which Main Modification number and/or supporting document does your representation relate to? (Each Main Modification within the Schedule has a reference number. This can be found in the first column i.e. MM1, MM2 and each Supporting Document has a reference number beginning with ED).

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MM no. **MM41**

5. Do you consider this Main Modification and/or supporting document:
(Please refer to the Guidance notes for an explanation of terms)

a) Is Legally compliant - **YES**
b) Sound - **NO**
Positively prepared - **NO** Effective – **NO**

6. Please give details of why you consider the Main Modification and/or supporting document is not legally compliant or is unsound. 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.

The Society made a response under **Policy T1 Sustainable Transport Choices, Paragraph Sustainable Transport Corridors** 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). We believe that Quiet Lanes and Home Zones are very beneficial in helping to maintain the Rural Character of our district and containing rising traffic growth that is widespread in our rural areas. We would still wish to see an additional Paragraph under Sustainable Transport Corridors that recognises the importance of Quiet Lanes as below.

7. Please set out what change(s) you consider necessary to make the Main Modification and/or supporting document 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.

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.

Part B – Your representation on the Main Modifications and/or supporting documents

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MM no. **MM54**

5. Do you consider this Main Modification and/or supporting document:
(Please refer to the Guidance notes for an explanation of terms)

- a) Is Legally compliant - YES**
- b) Sound - YES**

The Society made a response to Paragraph 4.59, Heritage Assets under DM7 with regard to ‘Protected Lanes’ and welcome and support the amendment made to this Paragraph.

Part B – Your representation on the Main Modifications and/or supporting documents

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MM no. **MM59**

5. Do you consider this Main Modification and/or supporting document:
(Please refer to the Guidance notes for an explanation of terms)

- a) **Is Legally compliant** - YES
- b) **Sound** - YES

The Society made general responses to Green Belt and Development paragraph 4.34 and Policy DM4 Green Belt and welcome and support the amendments made in MM59, Policy DM12 with regard to Basements.

Part B – Your representation on the Main Modifications and/or supporting documents

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MM no. **MM74 & MM75 (MM90 points on Financial Contributions)**

5. Do you consider this Main Modification and/or supporting document:
(Please refer to the Guidance notes for an explanation of terms)

- a) **Is Legally compliant** - YES
- b) **Sound** - NO
- Positively prepared** - NO **Effective** – NO

6. Please give details of why you consider the Main Modification and/or supporting document is not legally compliant or is unsound. 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.

MM74 - Supporting text to Policy DM 22 - New Paragraphs following 4.163 – The concerns raised in relation to Paragraph 4.163 and following: Air Pollution Mitigation Strategy (APMS)

MM75 - Supporting text to Policy DM 22 - Amend Part B and C – The concerns raised in relation to a potential ‘Clean Air Zone’ - Air Pollution Mitigation Strategy

With reference also to points in **MM90**

MM90 points now include a provision for financial contributions for the purposes of implementing air pollution mitigation initiatives and undertaking air quality monitoring and any necessary future air quality assessments. The Society believes this undermines the new local plan by effectively saying any negatives of proposed developments can be eliminated by making a financial payment.

Our Society fully supports the need to prolong the longevity of the Epping Forest SAC for the benefit of present and future residents. This historic natural environment provides our district with recreational and beautiful asset that also contributes to the reduction of Air Pollution throughout the whole District.

Main modifications **MM74** and **MM75** concern the Air Pollution Mitigation Strategy (APMS) and the proposed Clean Air Zone (CAZ). The society is concerned that some of the financial payments made will be spent on implementation of the CAZ, rather than alternative strategies to protect the EFSAC being sought. The APMS has not been subject to consultation by local residents.

Being a rural area any CAZ is not going to stop people using cars. Rather it will just penalise residents. Furthermore, traffic is likely to avoid the CAZ and divert via bell Common, down Piercing Hill and then along Loughton Lane. The forest and deer sanctuary are along this route and as a result part of the forest would suffer from increased, rather than less air pollution. The population of Theydon Bois and Loughton would also suffer from added pollution through these measures.

In the interests of protecting the Epping Forest SAC and the amenities that it provides the Society wonders if consideration could be given to a full public consultation on the APMS, such that residents can discuss and contribute to the best way forward.

Part B – Your representation on the Main Modifications and/or supporting documents

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MM no. MM90

5. Do you consider this Main Modification and/or supporting document:
(Please refer to the Guidance notes for an explanation of terms)

- a) Is Legally compliant - YES
- b) Sound - NO
- Positively prepared - NO Effective – NO

6. Please give details of why you consider the Main Modification and/or supporting document is not legally compliant or is unsound. 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.

While we find that most of the amendments made under MM90 Policy P8 are sound and effective we have a number of reservations with regard to the specific proposals in New Part C (iii) with regard to Theydon Bois. *“improvements and provision of green and blue infrastructure assets including open space;”* We are of the opinion that consideration by the council of the Woodland Trust’ site (also known as Theydon Wood) by EFDC will not be effective or deliverable as a potential provision of a Suitable Alternative Natural Greenspace (SANG) as suggested in EFDC’s Green Infrastructure Strategy due to this areas remoteness from our village and poor access along the Abridge Road because the pavement leading up to it is very narrow (i.e. difficult for a family with young children and pushchairs). We would though be opposed to a major upgrade to this paving as this would introduce an ‘Urbanising’ aspect to the Green Belt. A hard parking area within or outside the site would be even more unacceptable for the same reason. The alternative route via the present footpaths is again unsuitable for families with young children and is unsuitable even for most walkers in wet weather.

This Woodland Trust site was clearly not designed for nor is it suitable for general recreational purposes. The Trust’s Management Plan has always given a clear indication of their intention to keep access informal and low-key. Much of the site comprises of dense wooded areas protected by fencing allowing no easy access and unsuitable for recreational activities. The open areas of the site are all adjacent to the M11 Motorway and the noise and pollution from this roadway is very apparent when walking the footpath within this site and long term exposure during any intense activity would be annoying and unattractive to visitors and possibly long term exposure could be detrimental to health. It should also be noted that there is an agreement in place with our Parish Council that some of the open area on this site is reserved for an extension to the cemetery.

Therefore this site would be neither justified nor effective in providing the suitable alternative needed to mitigate against recreational pressure on the EFSAC from new development within Theydon Bois, and would not comply with the intended provisions of Policy DM 2.

All the new development in Theydon Bois is allocated to the north of the Village Green. In order to be effective, provision and improvements to open space should either be provided within the main settlement or adjacent to the existing, or new development.

Part B – Your representation on the Main Modifications and/or supporting documents

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4. Which Main Modification number and/or supporting document does your representation relate to? (Each Main Modification within the Schedule has a reference number. This can be found in the first column i.e. MM1, MM2 and each Supporting Document has a reference number beginning with ED).

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MM no. MM180

5. Do you consider this Main Modification and/or supporting document:
(Please refer to the Guidance notes for an explanation of terms)

- a) Is Legally compliant - NO
- b) Sound - NO
- Positively prepared - NO Effective – NO

6. Please give details of why you consider the Main Modification and/or supporting document is not legally compliant or is unsound. 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.

MM180 - Policy P 8 (Theydon Bois) - THYB.R1 - Land at Forest Drive

The Society made a detailed response to THYB.R1 Land at Forest Drive in the original consultation and we note that some of the text submitted by Epping Forest District Council ('EFDC') has now been amended to form part of MM180. Since the Submission Version of the Local Plan there has been a Planning Application for this site (EPF/0292/21) that we have also made a detailed objection to.

In our earlier submission we asked for more guidance with regard to the trees on this site and note that recently Epping Forest District Council has considered it appropriate to issue Tree Protection Orders on six specimen trees on this site, in order to ensure their longevity and the visual amenity which they provide. It would therefore be appropriate that the site map (previously on page 146) should be amended show the position of the trees adjacent to the western, and southern, boundaries and any development on this site should have a condition that protects these trees.

We note the amended section on Flood risk "In order to achieve this proposals should incorporate appropriate surface water drainage measures having regard to the Environment Agency Risk of Flooding from Surface Water Maps (RoFSW)" While we welcome this, as surface water flooding was one of the main concerns we raised, we are not convinced that referencing Maps (RoFSW) **alone** is sufficient in our rapidly changing Climate Conditions brought about by Global Warming. Although this map has been updated in 2021 it seems little different from the 2013 map and the present summary notes "*It is one of a group of datasets previously available as the (uFMfSW) Complex Package*" that seem to have been published prior to 2015. It further indicates that "*This dataset is not suitable for identifying whether an individual property will flood*". As recent weather events in the UK have shown the likelihood of catastrophic Surface Water Flooding events are considered to have increased by a factor of five times. This is partly due to negligence in calculating contemporary flood risk perceptions (FRP) into climate risk management (CRM) strategies. (ref: <https://www.sciencedirect.com/science/article/pii/S2212096321000462>) We would suggest that a

further modification is made here that says that the latest science on Climate Change should also be taken into account with regard to flooding preventative measures.

We note and support the new Section on Landscape Character where we also asked for further guidance. We would like to see a reference to the ‘Theydon Bois Dark Skies Policy that is outlined in the ‘Theydon Bois Village Design Statement’ as it would not be acceptable to have street lighting in this development. This and any other poorly designed lighting would also be detrimental to the Landscape Character. At present there is a permissive path, which runs from the South-West corner to the Northern boundary of the site granted by Epping Forest District Council. We would hope that EFDC will ensure that this permissive right of way is retained or an alternative path is integrated within the development layout. This path should retain and where possible improve on the views and rural aspects of the present path. The use of a main roadway as proposed in Planning Application **EPF/0292/21** is not an acceptable alternative.

7. Please set out what change(s) you consider necessary to make the Main Modification and/or supporting document 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.

1. **Amend section under ‘Flood Risk’ as follows:**

In order to achieve this the proposals should incorporate appropriate surface water drainage measures having regard to the Environment Agency Risk of Flooding from Surface Water Maps (RoFSW) and take into account the latest science on Climate Change with regard to the possible increased frequency of flood risk.

Add further amendment:

2. There are trees adjacent to the western and southern boundaries of the site which are protected by Tree Preservation Orders. The protected trees should be incorporated into the development proposals to avoid the loss of, or damage to, them.

Add further amendment:

3. 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.

Part B – Your representation on the Main Modifications and/or supporting documents

If you wish to make more than one representation, please complete a separate Part B form for each representation

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MM no. MM181

5. Do you consider this Main Modification and/or supporting document:
(Please refer to the Guidance notes for an explanation of terms)

- a) Is Legally compliant - Yes**
- b) Sound - NO**
- Positively prepared - NO Effective – NO**

6. Please give details of why you consider the Main Modification and/or supporting document is not legally compliant or is unsound. 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.

MM181 - Policy P 8 (Theydon Bois) - THYB.R2 - Theydon Bois London Underground Car Park

The Society made a detailed response to THYB.R1 Land at Forest Drive in the original consultation and we note and support the New Section under Heritage with regard to the Bull Public House where we asked for further guidance. *“Development of the site may impact upon the setting of the Proposals which may impact upon the setting of the Grade II listed Bull Public House, which lies to the West of the site. Proposals that may affect the setting of this heritage asset Listed Building should sustain or preserve or wherever possible, enhance the asset's significance, having regard to its architectural or historic interest, character, appearance and the contribution made by its setting”.*

We note the amended section with regard to Flood Risk. While some distance from the site (THYB.R1 - Land at Forest Drive) any surface water runoff resulting from an increased amount of hard surfaces within this development area together possible inadequate preventative methods at that site, are likely to impact on Forest Drive and this site (THYB.R2) as well, which has been affected by flooding in the past. We would suggest that as we outlined with respect to our response to MM180 above that a reference to Climate Change is included in the amendment.

We would like to see a reference to the ‘Theydon Bois Dark Skies Policy’ that is outlined in the ‘Theydon Bois Village Design Statement’ as it would not be acceptable to have street lighting in this development. This and any other poorly designed lighting would also be detrimental the area and setting of the Grade II listed Bull Public House.

7. Please set out what change(s) you consider necessary to make the Main Modification and/or supporting document 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.

1. Amend section under ‘Flood Risk’ as follows:

In order to achieve this the proposals should incorporate appropriate surface water drainage measures having regard to the Environment Agency Risk of Flooding from Surface Water Maps (RoFSW) and take into account the latest science on Climate Change with regard to the possible increased frequency of flood risk.

2. Add:

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.

Part B – Your representation on the Main Modifications and/or supporting documents

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MM no. MM182

5. Do you consider this Main Modification and/or supporting document:
(Please refer to the Guidance notes for an explanation of terms)

a) Is Legally compliant - Yes
b) Sound - Yes
Positively prepared - Yes Effective – Yes

6. Please give details of why you consider the Main Modification and/or supporting document is not legally compliant or is unsound. 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.

MM182 – Policy P8 – THYB.R3 – Land at Coppice Row

The Society made a detailed response to MM182 – Policy P8 – THYB.R3 – Land at Coppice Row in the original consultation and we note and support the New Sections with regard to Design and Heritage.

We would like to see a reference to the ‘Theydon Bois Dark Skies Policy that is outlined in the ‘Theydon Bois Village Design Statement’ as it would not be acceptable to have Street lighting within or around any development. This and any other poorly designed lighting would be detrimental to the area and setting of the Grade II listed Baldocks Farm House and views from the Village Green.

7. Please set out what change(s) you consider necessary to make the Main Modification and/or supporting document 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.

Add further amendment:

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

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. **After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

(Continue on a separate sheet if necessary)

8. Have you attached any documents with this representation which specifically relate to an MM or supporting document?

Yes

No

Signature:

J.F.Watts

[Redacted]

Date

22/09/2021