

Name:

David Linnell for LRA

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 and clearly print your name at the top of this form.

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

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

Positively prepared Effective
Justified Consistent with national policy

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.

MM47 Page 76-77 DM 2 Page 82-83

We are pleased that the Council, in their drafting of this MM, have implicitly acknowledged that *every* development proposal must be so examined; recognising, for instance that a proposal (other than a de minimis application) to increase the size of an existing dwelling *may* have a deleterious effect on the SAC, by the accommodation of extra people, their animals and vehicles, and vehicles, as well as one for an extra dwelling.

However, the current wording fails to clearly and specifically express the position, and needs amendments to the main text and to Footnote 2.

(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.

Main text to read

In recognition of the risks posed to the Epping Forest SAC from urbanisation effects over and above that resulting from normal recreational pressures (including but not limited to effects from fly-tipping, the introduction of non-native plant species, erosion of the forest edge, and incidental fires) planning applications for development will not be consented within 1km of the boundary of the Epping Forest SAC, unless it can be demonstrated through the assessment of individual planning applications that no harm (including through increased vehicular traffic) will result to the SAC.

Footnote 2, to read

It can be noted that this is not a “no development” buffer as such, but it introduces a duty on any potential developer to *prove* beyond all reasonable scientific doubt that detriment to the SAC would not occur.

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?

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Yes

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No

Signature:

....Redacted....

Date

20/09/21