

Name:

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

The MM currently specifies that planning applications for development will not be consented within 400m 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.

400 metres is a unsubstantiated and arbitrary distance, unsupported by scientific investigation. It was argued, and not questioned, at the EiP and elsewhere, that this was taken from the roaming distance for domestic cats, at another SAC, where the point at issue was predation of ground-nesting birds. It is therefore irrelevant and unhelpful in relation to the EFSAC.

Detriments, particularly re damage caused by multiple domestic hazards, such as barbecues, bonfires, dog-walking, Chinese sky lanterns, smoky chimneys, drug taking and paraphernalia, litter, car boot fly tipping, etc occur in relation to the Epping Forest SAC from development in the vicinity, but significantly further away than 400m.

7. Please set out what change(s) *(Continue on a separate sheet if necessary)* **in 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.

Although we would prefer a greater distance, we strongly suggest a figure of 1km as far more realistic than that suggested, and which would significantly reduce the levels of harm caused to the SAC by individuals and by vehicles. As an alternative, the prescribed area should be based on professional surveys of residents about their frequency of visit/drives through the SAC – we strongly believe that this would result in a figure greater than 1km.

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:

....Redacted.....

Date

20/09/21