

## **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**

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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***

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### **Part A**

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)

## 2. Personal Details

Title	Mr
First Name	John
Last Name	Padfield
Job Title (where relevant)	
Organisation (where relevant)	
Address Line 1	
Line 2	
Line 3	
Line 4	
Post Code	
Telephone Number	
E-mail Address	

## 3. Agents Details (if applicable)

Mr
Hywel
Morse
Sworders
The Stables
Bourton Hall
Bourton on Dunsmore
Warwickshire
CV23 9SD
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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  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

**Introduction:**

This representation is made on behalf of the landowners of site ref: THYB.R1 Land at Forest Drive, which is allocated for residential development of approximately 39 dwellings. Whilst the landowners support the allocation of the site and confirm that it is available immediately for residential development, this representation relates specifically to some of the details contained in policy P 8 and the site-specific requirements contained in Appendix 6.

These representations comprise our full case based on the evidence currently available. However, it is understood that technical site-specific appendices are due to be published but are not currently available. We request to reserve our right to comment further at the hearings stage,

once these have been published, in the event that they contain new information that we have not previously had the opportunity to comment upon.

As background, Table 5.1 categorises Theydon Bois as “Large Village”. The September 2015 Settlement Hierarchy Technical Paper which was produced to identify a hierarchy of settlements within the District and to inform the preparation of the Local Plan defines a Large Village as “a settlement that is smaller than a town, containing moderate facilities including reasonable public transport access. Can meet most local demands for “everyday” services.”

We agree with this assessment; Theydon Bois is a sustainable settlement which has a good range of local amenities including a primary school, GP surgery, parade of shops, public houses and village hall. It is in close proximity to the larger settlements of Loughton, Buckhurst Hill and Epping and has easy access to the local and national road network. It is served by an underground train station on the Central Line. In principle, therefore, Theydon Bois is a sustainable settlement which is suitable for future housing.

We support the strategy set out at paragraphs 2.60 and 2.61 of the Plan, to identify a number of small sites across the District in order to deliver much needed homes as early as possible. These are less reliant on the provision of strategic infrastructure and provide choice in the market. This approach adds built-in flexibility to the Plan, enabling it to adapt to rapid change, as required by the NPPF (paragraphs 14 and 157).

In common with the majority of the district, the site lies within the Green Belt. With regards to amending the Green Belt boundary to accommodate new development and the Council’s approach to assessing this; We agree with the Council’s view that Green Belt parcels should not be assessed against purpose 5 (to assist in urban regeneration) and Purpose 3 (Assist in safeguarding the countryside from encroachment) as reasoned in the Green Belt Assessment: Stage 2 August 2016. As stated in paragraph 5.115, development has been focussed to minimise any harm on the wider landscape and Green Belt in the most sustainable location immediately adjacent to the settlement. As such, the allocation of this site, in preference to other options around Theydon Bois, represents the least harm to the Green Belt.

According to the Epping Forest Green Belt Assessment: Stage 2 August 2016, the site forms a small part of larger land parcel 043.1. Section 4 of this assessment summarises the study findings, listing contribution against Green Belt purposes and level of harm for each land parcel as a whole. Whilst the summary suggests that release of parcel 043.1 would be harmful, its purpose 3 is removed. Potential level of harm to the Green Belt associated with release of parcel reduces to moderate (as shown on Figure 4.6 of the Green Belt Assessment. In any case no detailed assessment of smaller parts of the parcel, which in the case of site THYB.R1 comprises the southern part of the larger parcel, are presented. The full assessment findings in relation to the performance of Green Belt parcels against the purposes of Green Belts can be found in the Technical Annex (Epping Forest District Green Belt Study Stage 2: Technical Annex, July 2016). It is our understanding that technical site-specific appendices of the Site Selection Report (Arup December 2017) will contain further analysis regarding the sites allocation; this is being finalised and will be published once the detailed write-up has been completed. We therefore request to reserve our right to comment further at the hearings stage, once the technical site-specific appendices have been published as these could contain new information.

Turning specifically to policy P 8:

#### **Part B: Residential Sites**

The policy allocates three sites for residential development.

With regards to site ref: THYB.R1, Land off Forest Drive; we support the allocation of this site which is in a suitable sustainable position in an edge of settlement location and constitutes a logical extension to Theydon Bois. The site is currently in agricultural use and access to the site is via the existing access directly off Forest Drive in a 30mph zone with adequate visibility. The site is situated in Flood Zone 1 and has no other physical constraints that would hinder its development. We therefore consider that the site is achievable, available and deliverable.

We support the proposed density of approximately 39 dwellings. This equates to a density of 44 dwellings per hectare (dph) which is considered appropriate and achievable for this edge of settlement location. This density is further advocated by the proposed changes to the National Planning Policy Framework published in December 2015 which offers support for higher density residential developments at transport and commuter hubs. The site is within 500 metres of Theydon Bois Underground Station which has direct rail links to Central London (Liverpool Street). We are confident that the site can be master planned and designed to minimise impact on the Green Belt and local landscape, to allow for any on-site constraints identified through detailed survey work (such as flooding or drainage, ecology, trees, contamination etc) to safeguard the amenity of adjacent residents, to respect the local vernacular, to provide appropriate parking and turning space for vehicles, to encourage walking and cycling, to provide the required open space and landscaping and an appropriate density of development. Detailed survey work addressing any constraints and a masterplan can be provided with the hearing statement if required to support the allocation.

It is understood that technical site-specific appendices are due to be published, however, these are not currently available. Therefore, we request to reserve our right to comment further at the hearings stage, once the technical site-specific appendices have been published as these could contain new information.

### **Parts C and D: Infrastructure Requirements**

Part C and D of the policy (Infrastructure Requirements) requires delivery of infrastructure at a rate and scale to meet the needs that arise from the new development and accordance with the Infrastructure Delivery Plan (IDP). Part C lists highways, water waste networks and drainage and open space improvements/upgrades, requiring developments in Theydon Bois to contribute proportionately towards them. Part D states that planning applications will only be permitted where they contribute towards the infrastructure items set out in the IDP or discussions with providers determine these items are no longer required.

We are generally supportive of the principle of providing infrastructure contributions where they are linked to the development proposed, in accordance with paragraph 204 of the NPPF, which requires planning obligations to be “directly related” and “fairly and reasonably related in scale and kind” to the development.

However, we object to the requirement to accord with the IDP and specifically the wording that “The Council will only permit planning applications that contribute towards the delivery of those items set out above and in the Infrastructure Delivery Plan...”

The status of the IDP is not clear, nor whether it is intended to be updated prior to the Examination.

As a matter of principle, non-statutory planning documents such as the IDP, which have not been tested through the Examination process, should not be used to set policies or determine development proposals in the way that Parts C and D require.

The NPPF (paragraph 153) and the National Planning Practice Guidance sets out that the detail concerning planned infrastructure provision can be set out in a supporting document. However, the key infrastructure requirements on which delivery of the plan depends, should be contained in the Local Plan itself (Paragraph: 018 Reference ID: 12-018-20140306).

Moreover, the requirement to accord with it has not been justified or tested in terms of the tests of planning obligations as required by the NPPF (paragraphs 204-205) or the potential impact on the deliverability of development schemes as required by the NPPF (paragraphs 158, 173-174). This requirement could have a critical effect on the viability of housing development in the District, and the deliverability of sustainable development cannot be compromised by unnecessary and unduly onerous requirements.

Furthermore, Part D states that applications which do not accord with the IDP will only be permitted if “subsequent iterations” of the IDP or “discussions with providers determine that these items are no longer required.” Details regarding updates/revisions to the IDP are not provided nor is it clarified who the providers are. As such, it is not clear to applicants or decision makers under what circumstances applications can depart from the IDP.

We object to the inclusion of the list of items at parts (i), (ii) and (iii) as these are not based on robust or proportionate evidence but a non-statutory planning document, which have not has not been tested through the Examination process. Policy P 8 relates to allocations for three different residential developments which will give rise to different infrastructure requirements. It is not clear how the sites under this policy will contribute to the listed items in the IDP or which items are required to be delivered by which allocated site.

Finally, in relation to the IDP specifically, Figure 3 sets out the quantum of development tested for each settlement differs from that contained in the Regulation 19 Submission Local Plan. For example, it apparently tests 47 dwellings in Theydon Bois which is 10 less than the 57 proposed. This is believed to be a typographic error and the rows in the table are misaligned. However, we would like to reserve our right to make additional comments at the Examination stage in relation to the IDP, should the council confirm that figure 3 represents the actual quantum of development proposed for each settlement.

We request that Part C is revised to replace “in accordance with” with “have regard to” the IDP. We request that parts (i), (ii) and (iii) be revised to clearly state which development sites are being expected to contribute to which infrastructure and how any potential apportionment of costs will be calculated. These must be underpinned by robust and proportionate evidence.

We request that part D be amended to read “Planning applications will be expected to contribute positively towards the delivery of infrastructure items listed above and in the Infrastructure Delivery Plan, unless subsequent iterations of the Infrastructure Delivery Plan determine that these items are no longer required or those items do not meet the tests of planning obligations set out in the NPPF or legal tests in the Community Infrastructure Levy (CIL) Regulations.”

We request that the IDP is revised prior to the examination, so that it is explicit which development sites are being expected to contribute to which infrastructure and how any potential apportionment of costs will be calculated. Any items critical to delivery in the first five years of the plan period should be clearly stated in the Plan itself and underpinned by robust and proportionate evidence.

## **Part E: Air Pollution**

Paragraph 4.20 of the Plan advises in relation to air quality and Epping Forest that “concerns exist in relation to both increasing recreational use and air borne pollutants, including from traffic. The latter points to an underlying traffic/ air quality issue as a result of existing substantial baseline traffic flows.” It goes on to state that “Standard impact assessments show that the Local Plans being developed within the West Essex/ East Hertfordshire Housing Market Area would not result in any adverse effect due to an expected improvement in air quality through the introduction of new technologies , and contributions to any retardation of that improvement is extremely small’. The requirement to undertake an air quality assessment is therefore not evidence based and not justified.

Notwithstanding the above, we do not consider that Part E is necessary, since Policy DM22 already requires larger development proposals or those that have the potential to produce air pollution to be required to undertake an Air Quality Assessment. The Part E requirement for this to apply to any development proposals which require a Transport Statement/Transport Assessment slightly conflicts with the wording of DM22 meaning it is unclear to applicants and decision makers when an Air Quality Assessment is required.

According to the NPPF (paragraph 154), only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan. We request that Part E be removed. Its inclusion is unjustified and unnecessary as the issue is addressed in Policy DM22.

#### **Part F: Recreational Pressure**

We are generally supportive of the principle of providing contributions where they are linked to the development proposed, in accordance with paragraph 204 of the NPPF, which requires planning obligations to be “directly related” and “fairly and reasonably related in scale and kind” to the development.

However, we object to the requirement to make a financial contribution to access management and monitoring of visitors to the Epping Forest Special Area of Conservation..., and specifically the wording that “Development Proposals will be required...”

The status of both the Natural England Action Plan and related Visitor Survey Information, neither of which is included in the list of Technical Information, is not clear, nor whether it is intended that they be updated prior to the Examination.

As a matter of principle, non-statutory documents such as the Visitor Survey Information and Natural England Action Plan cited, which has not been tested through the Examination process, should not be used to set policies or determine development proposal requirements in the way that Appendix 6 requires.

Moreover, the requirement to contribute towards the access management and monitoring of visitors has not been justified or tested in terms of the tests of planning obligations as required by the NPPF (paragraphs 204-205) or the potential impact on the deliverability of development schemes as required by the NPPF (paragraphs 158, 173-174). This requirement could have a critical effect on the viability of housing development in the District, and the deliverability of sustainable development cannot be compromised by unnecessary and unduly onerous requirements.

Notwithstanding the above, we note that the Habitats Regulations Assessment 2017 advises that “The size of the tariff to be placed on net new housing within the core catchment to fund the action plan and its measures remains to be determined but should be confirmed prior to

submission of the Local Plan to the Secretary of State for examination by the end of March 2018.”. We request to reserve our right to comment further on this matter at the hearings stage, if these tariffs are published.

We request that Part F is removed as its inclusion is unjustified and does not comply with the NPPF. Furthermore it is unnecessary as the matter is already addressed in policy DM2.

### **Part G: Flood Risk**

The Environment Agency Flood Maps for Planning demonstrate that the site lies entirely within Flood Zone 1 and as such it has a low probability of flooding. As such, this proposed allocation accords with part G of policy P12 that residential development must be located wholly within Flood Zone 1.

### **Appendix 6: Site Specific Requirements for Site Allocations**

#### **THB.R1 Land at Forest Drive**

##### **Flood Risk**

The Site-Specific Requirement for this site allocation contained at Appendix 6 states that the site has been identified as being at risk of surface water flooding. As such, the design and layout should reduce the vulnerability and consequences of flooding to the site and surroundings and that development proposals should incorporate appropriate surface water drainage measures in order to achieve this.

We are confident that sufficient land exists within the ownership of the landowner to be able to incorporate the necessary sustainable drainage measures without constraining development. A Drainage Strategy can be provided at application stage or with the hearing statement, if required.

##### **Ecology**

We are generally supportive of the principle of providing contributions where they are linked to the development proposed, in accordance with paragraph 204 of the NPPF, which requires planning obligations to be “directly related” and “fairly and reasonably related in scale and kind” to the development.

However, we object to the requirement to make a financial contribution to access management and monitoring of visitors to the Epping Forest Special Area of Conservation..., and specifically the wording that “Development Proposals will be required...”

The status of the both the Natural England Action Plan and related Visitor Survey Information, neither of which is included in the list of Technical Information, is not clear, nor whether it is intended that they be updated prior to the Examination.

As a matter of principle, non-statutory documents such as the Visitor Survey Information and Natural England Action Plan cited, which has not been tested through the Examination process, should not be used to set policies or determine development proposal requirements in the way that Appendix 6 requires.

Moreover, the requirement to contribute towards the access management and monitoring of visitors has not been justified or tested in terms of the tests of planning obligations as required by the NPPF (paragraphs 204-205) or the potential impact on the deliverability of development schemes as required by the NPPF (paragraphs 158, 173-174). This requirement could have a critical effect on the viability of housing development in the District, and the deliverability of sustainable development cannot be compromised by unnecessary and unduly onerous requirements.



Notwithstanding the above, we note that the Habitats Regulations Assessment 2017 advises that “The size of the tariff to be placed on net new housing within the core catchment to fund the action plan and its measures remains to be determined but should be confirmed prior to submission of the Local Plan to the Secretary of State for examination by the end of March 2018.”. We request to reserve our right to comment further on this matter at the hearings stage, if these tariffs are published.

We request that this requirement is removed. Its inclusion is unjustified and the matter is already addressed in policy DM2.

### **On- site Constraints**

Noise Impacts: Sufficient land exists within the site to be able to incorporate any necessary mitigation in relation to noise impacts into the layout and design of the development. This could include physical buffers and building specifications to insulate properties. A noise mitigation strategy can be provided with the hearing statement if required.

The Permissive Path: We object to the suggestion that this permissive path was granted by Epping Forest District Council. This is factually incorrect as access along this permissive path, whilst administered by the LPA, was granted at the discretion of the landowner for the enjoyment of the public.

We object to the requirement to integrate the permissive path which dissects the site within the development layout. Whilst the development of the site could include a pedestrian access through the site, which could also improve connectivity to the wider Public Rights of Way network the requirement to incorporate the existing route of the permissive path into the layout is unduly prescriptive and not justified. Indeed our client is willing to facilitate access directly from the Public Right of Way e to the land directly to the north of the site which is also in his ownership.

Paragraph 154 of the NPPF advises that “Local Plans should be aspirational but realistic... Only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan.” Furthermore such a requirement has not been tested in terms of the deliverability of development schemes as required by the NPPF in Paragraph 173. It is not a Public Right of Way and the requirement to incorporate the route of the existing path which diagonally dissects the site could have a critical effect on the viability of the sites development and its ability to deliver the density of houses envisaged. The deliverability of sustainable development should not be compromised by unnecessary and unduly onerous requirements.

We request that the sentence starting “Subject to discussions with Epping Forest District Council...” be amended to read “Development proposals should seek to incorporate a pedestrian footpath within its development layout to maintain and where possible improve connectivity to the wider Public Rights of Way network.”

### **Infrastructure**

This suggests that development proposals for residential development “should limit the provision of on-site residents parking to that required to service the essential needs of the development. Provision should be made for on-site for car clubs/ car sharing or pooling arrangements, visitor parking and blue badge holders” citing the proximity of the allocated sites to a London Underground station as justification for this approach.

This wording is ambiguous and it is unclear to applicants and decision makers what is being sought. According to the NPPF (paragraph 154), only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan.

Notwithstanding our concerns in relation to the wording, it appears, in essence to be requiring new residential developments in Theydon Bois to be 'car free'.

A factor that must be taken into account is the impact of the Essex County Council Parking Standards, particularly on those sites suitable for predominantly 2 or 2.5 storey development such as THYB.R1 a settlement edge site which adjoins existing two storey residential development. The 2009 parking standards moved to minimum standards for residential parking, rather than the maximum standards that had previously applied.

Whilst Essex County Council Standards might be perceived as taking a 'one size fits all' approach, it should be noted within the introduction to the Essex Standards that the move from maximum car parking standards at trip origin to minimum standards was based on the fact that, *"...limiting parking availability at trip origins does not necessarily discourage car ownership and can push vehicle parking onto the adjacent public highway, diminishing the streetscape and potentially obstructing emergency and passenger transport vehicles."*

Given the experiences, and underlying case study work, that led to the implementation of the 2009 standards, the requirement for THYB.R1 to be a 'car free' development is neither justified as it is not evidence based, particularly as in the case of Theydon Bois, because of the London underground station and lack of dedicated parking, significant on street problems already exist which would be exacerbated if sufficient off street parking isn't provided by the allocation sites. It is suggested that significantly less weight be placed on access to services and specifically the nearby London underground station, and far greater weight be placed on understanding levels of car ownership across each individual settlement (rather than categories of settlement).

We object to the wording "Contributions will be sought for implementing Controlled Parking Zones in the vicinity of the site". The requirement to provide this contribution has not been justified or tested in terms of the tests of planning obligations as required by the NPPF (paragraphs 204-205) or the potential impact on the deliverability of development schemes as required by the NPPF (paragraphs 158, 173-174). The requirement for such a contribution will depend on the detailed layout and consequential impacts resulting and therefore it is at the planning application stage that consideration should be given to requiring this.

We request that the wording be amended to read "To promote sustainable transport modes and encourage active transport development proposals for residential development, regard should be had to limiting the provisions of on-site resident car parking. This could include providing on-site car club/ car sharing or pooling arrangements and dedicated visitor and blue badge parking. Contributions may be sought for implementing Controlled Parking Zones in the vicinity of the site."

### **Green Belt Boundary**

Based, , on the information currently available we consider that the new Green Belt boundary, which would follow the line of an existing field boundary and would be created through allocation of this site, would form a logical continuation of the Green Belt boundary between the rear gardens of the existing properties fronting Dukes Avenue and the Central line railway line. This would use physical features to result in a readily recognisable, permanent boundary, capable of enduring beyond the plan period, in accordance with paragraphs 83 and 85 of the NPPF.

The Site-Specific Requirement for this site allocation contained at Appendix 6 states that the existing feature along the northern edge of the site will need to be strengthened. It is the landowner's intention that this be enhanced and strengthened through additional mixed native species planting and sufficient space exists within the landowner's ownership to be able to provide this.

7. Please set out what changes(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.

**Part C:**

In order to make the policy sound and NPPF compliant we request that Policy P8, Part C is revised to replace "in accordance with" with "have regard to" the IDP.

We request that parts (i), (ii) and (iii) be revised to clearly state which development sites are being expected to contribute to which infrastructure and how any potential apportionment of costs will be calculated. These must be underpinned by robust and proportionate evidence.

**Part D:**

We request that Policy P8, Part D be amended to read "Planning applications will be expected to contribute positively towards the delivery of the critical infrastructure items listed above and in the Infrastructure Delivery Plan, unless subsequent iterations of the Infrastructure Delivery Plan determine that these items are no longer required or those items do not meet the tests of planning obligations set out in the NPPF or legal tests in the CIL Regulations."

We request that the IDP is revised prior to the examination, so that it is explicit which development sites are being expected to contribute to which infrastructure and how any potential apportionment of costs will be calculated. Any items critical to delivery in the first five years of the plan period should be clearly stated in the Plan itself and underpinned by robust and proportionate evidence. Part C should be amended and "in accordance with" replaced with "have regard to the IDP".

**Part E:**

To ensure Policy P8 is justified and NPPF compliant we request that Part E be removed. Furthermore its inclusion is unnecessary as the issue is addressed in policy DM22,

**Part F:**

To ensure Policy P8 is justified and NPPF compliant we request that Part F is removed. Its Furthermore its inclusion is unnecessary as the matter is already addressed in policy DM2.

**Appendix 6:**

We request that the section titled “Ecology” be removed to ensure the plan is justified and policy compliant. In any case its inclusion is unnecessary as the matter is already addressed in policy DM2.

In the On-site Constraints section, the sentence starting “Subject to discussions with Epping Forest District Council...” be amended to read “ Development proposals should seek to incorporate a pedestrian footpath within its development layout to maintain and where possible improve connectivity to the wider Public Rights of Way network.” to ensure that the plan is justified and NPPF compliant.

In relation to Infrastructure, in order to ensure the plan is justified and NPPF compliant we request that the wording be amended to read “To promote sustainable transport modes and encourage active transport development proposals for residential development regard should be had to limiting the provisions of on-site resident car parking. This could include providing on-site car club/ car sharing or pooling arrangements and dedicated visitor and blue badge parking. Contributions may be sought for implementing Controlled Parking Zones in the vicinity of the site.”

These modifications to the Policy P8 and the corresponding site specific requirements for Site Ref: THYB.R1 contained in Appendix 6 are required to ensure that Policy P8 is effective, justified and consistent with national policy as required by paragraph 182 of the NPPF.

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 at the hearings

☒ **X** **Yes**, I wish to participate at the hearings

December 2017

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

The objections raised relate to significant issues which would be most appropriately discussed at the oral hearing and cannot be dealt with satisfactorily through written representations alone.

**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.

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

☒ Yes ☐ No

11. Have you attached any documents with this representation?

☐ Yes ☒ No

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Signature:

.....Redacted.....

Date:

29/01/2018