

**4. This representation relates to**

Paragraph

**Policy Policy DM7**

Site reference

Settlement

5. We consider that this part of the Submission Version of the Local Plan is

**b) Sound: No**

because it fails

**Positively Prepared**

**Justified**

**6. Details of why we consider the Plan to be unsound**

6.1 In para C of Policy DM7<sup>i</sup>, the Local List is mentioned, but there is no indication as to how it is to be established and revised.

6.2 Paragraph 5.35 of the Heritage Asset Review, part of the Evidence Base, suggested the establishment of “areas of townscape merit”<sup>ii</sup>, in consultation with parish councils and amenity and heritage groups. This has not been included; the Policy is therefore incomplete and thus the protection of heritage is incomplete.

**7. Changes needed**

The Plan could be made sound by a commitment to review the Local List on a five-yearly cycle with the parishes taking the lead, and to review

- designation of new Conservation areas, and
- boundaries of existing Conservation areas

on a similar cycle.

**8. Participation in the oral part of the examination**

Yes, we wish to participate in the hearings.

**9. We consider this to be necessary because**

We think that it is necessary for us to participate at the hearings

- Because of our local knowledge (see description of Loughton Residents Association below)
- Because of the Council’s failure to take proper action in respect of the views expressed in public consultations or in feedback from local Cllrs (see for example our representation on Site LOU R5 Loughton.

**About Loughton Residents Association**

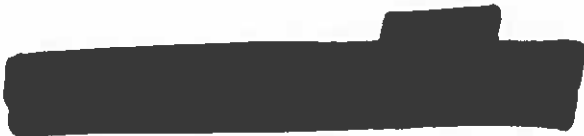
Loughton Residents Association is a very active group of local residents who care for Loughton and its environment. Our membership is around 1,000 households, and we have been in existence for over 35 years. We are independent of any political party. We seek, and listen to, the views and concerns of Loughton residents and take action in support. We have a majority of the councillors on the Loughton Town Council, are the second largest group

on Epping Forest District Council & are represented on Essex County Council. We provide our own regular printed and email newsletters to residents and our own website, [www.loughtonresidents.org.uk](http://www.loughtonresidents.org.uk)

**10. We wish to be notified when the Plan is submitted for independent examination**

Yes ✓

**11. Have you attached any documents to this application? No**



**Signature:**

**28/01/18**

---

**<sup>i</sup> Policy DM 7 Heritage Assets**

.....

Local Heritage Assets

C. Development proposals that affect local heritage assets detailed on the Local List will be expected to demonstrate how they retain the significance, appearance, character and setting of the local heritage asset.

**<sup>ii</sup> Heritage Asset Review – Final Report**

5.35 One potential approach would be a local area designation that is similar to local listing for individual properties. This could, for instance, be a designation of areas of 'Local Townscape Merit'. The NPPF continues the idea of designated and undesignated heritage assets set out in PPS5 and a robust justification could be made to apply the principle of undesignated heritage assets to areas of townscape. The plan making approach advocated by the NPPF would allow for a flexible and creative response that protects cherished local townscapes and as such it is our view that such a designation would be entirely in accordance with the NPPF.

<http://www.efdclocalplan.org/wp-content/uploads/2017/12/Heritage-Asset-Review-DPP-2012-EB902.pdf>