

**4. This representation relates to**

Paragraph

Policy DM9

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 There needs to be an explicit policy on height of any new development in the District.

6.2 Paragraph A of Policy DM9<sup>i</sup> is far too weak. It refers to

“The Council will require all development proposals to be design-led and:

(i) relate positively to their context;” (p92)

6.2 "Positive relation" is far too indefinite a concept, and is liable to subjective interpretation. For example, a 5-storey building in an area of 2-storey houses might be thought by some a "positive relation".

6.3 The policy is hence internally inconsistent, and too vague. It has not been positively prepared and is not the most appropriate strategy.

6.4 While we appreciate that this can be a difficult area, we have had many examples in recent years of planning applications in Loughton which were clearly out-of-keeping with their surroundings because of their height, and which would if approved have significantly adversely affected the character of the town.

**7. Changes needed**

The plan could be made sound by adding after *heights* in Policy DM9 D(i)<sup>ii</sup>

Buildings should be no higher than the generality of their surroundings. Where service facilities are required on top of a building and would bring its height to greater than the generality of its surroundings, these should be set back so as not to be visible from the surrounding public area(s).

**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:**

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**28/01/18**

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**i Policy DM 9 High Quality Design**

A. All new development must achieve a high specification of design and contribute to the distinctive character and amenity of the local area. The Council will require all development proposals to be design-led and:

- (i) relate positively to their context;

**ii Policy DM 9 High Quality Design**

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Design Standards

D. Development proposals must relate positively to their locality, having regard to:

- (i) building heights;