

Appendix 2 – Outstanding Objections

For proposed modifications, underlined text = new text suggested, and ~~Strikethrough text~~ = text proposed for removal

Objections in relation to education matters

Representation Ref.	Policy	Objection on soundness 1- Positively prepared; 2 -Justified; 3- Effective; 4 - Consistent with National Policy	ECC proposed modifications	Current position
29	Policy SP 5H paragraphs (vii) & (viii)	3 – Effectiveness The comments made regarding Paragraphs 2.125 / 2.128 / 2.129 (page 42) and Policy SP5 (page 43) apply (regarding education provision). These paragraphs also need to make it clear that delivery will be planned in tandem with the housing allocations on Harlow’s side of the boundary. The interdependencies between the two will require a statement of common ground between the two districts and ECC. In the case of secondary education, it may be more appropriate to locate the school on Harlow’s side of the boundary. However, there is insufficient evidence for ECC to express a preference at this point (in its role as Education authority).	Revise wording of Policy SP 5H paragraphs (vii) & (viii) to make it clear that delivery of education provision will be planned in tandem with the housing allocations on Harlow’s side of the boundary. ECC recommends joint working with EFDC prior to Local Plan submission to agree a form of wording.	<p>EFDC position:</p> <p>Policy SP 4 point (ix) requires Garden Communities to be developed ‘...in tandem with the development it supports to mitigate any impacts of the new Garden Communities’.</p> <p>A Local Plan cannot apply policy requirements on sites which are not within its administrative boundary. The most appropriate approach to ensure the timely delivery of education (and other infrastructure) provision is through a single masterplan for all of East Harlow strategic sites. This single masterplan is currently being developed jointly by EFDC, HDC, ECC and the site promoters.</p> <p>A Harlow and Gilston Garden Town Infrastructure Delivery Plan is also being development which will help to address cross-boundary infrastructure matters.</p> <p>ECC position:</p> <p>This matter was discussed as part of work to develop a SoCG. ECC understood that EFDC would propose a new reference in response. This would provide for a fall-back position to cover the possibility that it might not prove possible to identify and deliver a suitable secondary school site within the EFDC part of E of Harlow. The reference would state that in such a case, the secondary school would instead need to be provided within the HDC part of E of Harlow. ECC accordingly maintains this representation.</p> <p>ECC and EFDC agree on principle / basis of this but the actual proposed wording to address it will need to be developed and agreed subsequently.</p>
33	Maps 2.2 / 2.3 / 2.4	3 – Effectiveness As with comments against Policy SP 5 (page 42) these maps need to either show suitable school sites as D1 allocations or make it clear that the orange hatching includes areas of D1 class land and are not purely for residential use as currently indicated.	Amend maps 2.2, 2.3 & 2.4 to either show suitable school sites as D1 allocations or make it clear that the orange hatching includes areas of D1 class land and are not purely for residential use as currently indicated.	<p>EFDC position:</p> <p>The exact location of education sites and facilities will be determined through strategic masterplans and individual planning applications. To provide future clarification, it is suggested that the following modifications should be included in the LPSV:</p> <p>Proposed LPSV modification:</p>

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				<p>For map 2.1 2.2 2.3 2.4 5.1 and 5.12 change the Legend as follow:</p> <p>Residential <u>Strategic</u> site allocation</p> <p>ECC position: The proposed (map legend) change only covers the basic description for the notation in question. It does not make clear that the site allocation includes areas of land to be identified for education (D1 class) land and are not purely for residential use as currently indicated. ECC accordingly maintains this representation.</p> <p>ECC understands that related map questions remain to be considered and ECC is open-minded to how deliberations on those might resolve this representation.</p>
34	Policy SP 6	<p>3 – Effectiveness A number of (existing) school sites currently remain proposed as part of the Green Belt, thereby adding planning risk to any future expansion proposals necessary to support the Local Plan. This includes the need for flexibility in the Local Plan and the required ability to be able to respond effectively to changes in circumstances (without changing the Local Plan itself). ECC (as Education authority) has raised this point at the Regulation 18 consultation stage. As set out below in the representation on Policy DM4, ECC considers that revisions to Green Belt boundaries could deal with this and in this context, ECC notes that in preparing the Local Plan, a Green Belt review has been carried out (2016). Alternatively, a Local Policy providing for such exceptions could be incorporated.</p>	<p>Revise Green Belt boundaries to exclude these sites from the Green Belt. This would require corresponding revisions to Map 2.5 (Green Belt Boundary Alterations). Alternatively, include a new Local Plan policy provision to allow for future development flexibility for education sites within the Green Belt. In either case, ECC recommends joint working with EFDC prior to Local Plan submission to agree the boundary changes or a form of wording of this (which could utilise best practise policy wording from other adopted Local Plans).</p>	<p>EFDC position:</p> <p>EFDC maintains that current policies in the LPSV provide sufficient flexibility to allow future school development in the Green Belt where it is appropriate and justified. However, to provide future clarification, it is suggested that the following modifications should be added:</p> <p>Proposed LPSV modification: New paragraph after 6.23</p> <p><u>A number of education sites in the District are located within areas designated as Green Belt. The Council acknowledges that from time to time new and/or replacement buildings for education (and associated) uses will be required on these sites. In accordance with national and local policy requirements, inappropriate development (including educational facilities) should not be approved within the Green Belt except in very special circumstances. As education (and associated) facilities are generally considered to be essential facilities for the District, in such cases, very special circumstances will not exist unless a clear educational need and a requirement for a Green Belt location can be demonstrated. Subject to those considerations, the form of development proposed, and the extent of harm to Green Belt and any other harm, applications proposing the expansion of essential facilities on existing education sites will be considered favourably by the Council.</u></p> <p>ECC position: ECC has consistently requested either removing these sites from the Green Belt, or otherwise a policy response to provide the flexibility and clarity of policy required. ECC has provided an example policy</p>

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				approach for EFDC on this matter currently being progressed through examination elsewhere in Essex. The EFDC response has been to propose paragraph / explanatory wording revisions, but no policy response. Accordingly, this subject remains not agreed.
39	Policy DM 4	3 - Effectiveness There is a number of schools in the Green Belt within Epping Forest District. ECC notes that a Green Belt review has been carried out for the preparation of this Local Plan. Accordingly, school sites should be removed from the Green Belt, which Local Plan preparation process allows. This is in the interests of ensuring that the education infrastructure necessary to support the Local Plan (and any other) growth can be delivered, in response to changing / growing needs for education. Alternatively, a Local Plan Policy providing for such exceptions could be incorporated.	Revise Green Belt boundaries, in response, to exclude these sites from the Green Belt. Alternatively include a new Local Plan policy provision to allow for future development flexibility for education sites within the Green Belt. ECC (as Education authority) recommends joint working with EFDC prior to Local Plan submission to agree a form of wording (which could utilise best practise policy wording from other adopted Local Plans).	See Representation Ref. 34 above
47	Map 5.1 (Epping)	3 - Effectiveness This map needs to either show a suitable school site as a separate D1 use class site allocation or make it clear that the orange hatching includes 2.1 hectares of D1 class land and that it is not purely for residential use as currently indicated.	Revise Map 5.1 to reflect site allocation to either show a suitable school site as a separate D1 use class site allocation or make it clear that the orange hatching includes 2.1 hectares of D1 class land and that it is not purely for residential use as currently indicated.	See Representation Ref. 33 above ECC position: The proposed (map legend) change only covers the basic description for the notation in question. It does not make clear that the site allocation includes areas of land to be identified for education (D1 class) land and are not purely for residential use as currently indicated. ECC accordingly maintains this representation. ECC understands that related map questions remain to be considered through examination (having been raised by the Inspector) and ECC is open-minded to how deliberations on those might resolve this representation
52	Policy P 3G (Waltham Abbey)	3 - Effectiveness ECC is not aware of any current proposals at this time for the potential relocation (and expansion) of the secondary school concerned. The evidential basis and deliverability has not been provided.		EFDC and ECC position This matter has been reviewed and discussed between EFDC and ECC. ECC has confirmed that it is content for the current reference to this matter to remain within Policy P 3 G. However, in order to ensure that the fuller, correct circumstances and position on this are reflected within the Local Plan, ECC recommends that the following wording (or equivalent) is included at paragraph 5.55 (or a new paragraph following this):

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				<p><u>Essex County Council recognises that Policy P3 (paragraph G) reflects a local aspiration to relocate the King Harold Academy and raises no objection to this outcome in the event that it is proven feasible and can be funded without cost to the Essex taxpayer. Any relocation would be a matter for the Academy, the Department for Education and the Local Planning Authority but would need to include appropriate additional capacity (around two forms of entry) to meet the local housing growth set out in the Local Plan. Essex County Council is currently investigating a one or two form entry expansion of King Harold Academy, on their current site, to address the anticipated level of growth.</u></p> <p>This matter is not necessarily a point of disagreement, but instead there has not been sufficient time to conclude on the latest position and proposal as yet</p>

Objections in relation to Health and Well-being

Representation Ref.	Policy	Objection on soundness 1- Positively prepared; 2 -Justified; 3- Effective; 4 - Consistent with National Policy	ECC proposed modifications	Agreed position
1	Policy Omission	4 Consistency with national policy The Local Plan includes reference to health and well-being matters, however, Public Health recommends that an over-arching health and well-being policy and/or a specific Health Impact Assessment (HIA) policy is included in the Local Plan. The threads of these matters are identifiable in places but not readily obvious and sufficiently explicit and clear. Instead a Plan user needs to read it all to find these. It is accordingly unclear as to how this specifically supports the NPPF 'Promoting Healthy Communities' sections. This matter was raised by ECC in its representation at the Regulation 18 Local Plan consultation stage.	ECC proposes an over-arching health and well-being policy, as attached in Appendix 3, with explanatory text	<p>EFDC position:</p> <p>EFDC does not consider it necessary to include an overarching health and well-being policy in the LPSV as the Plan has already included policies to promote health communities (e.g. Policy SP 4, DM 5, T 1 and D 2) which are sufficient to meet with NPPF requirements. To provide further clarification, EFDC have suggested a number of modifications including modifications to the LPSV Vision, new supporting text in paragraph 6.23 and additional policy text under Policy D 2. These proposed modifications are currently being considered by ECC.</p> <p>Proposed LPSV modification:</p> <p>Vision for the District, point (i)</p> <p>(i) residents continue to enjoy a <u>healthy, happy and</u> good quality of life;</p>

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				<p>Page 20 - New point under part section A of the Local Plan Objectives</p> <p><u>(vii) to ensure new development supports healthy living through their design and provide opportunities for physical activity, access to quality open spaces and employment opportunities.'</u></p> <p>Policy DM 9 part A point (v) (v) incorporate design measures to <u>promote healthy communities and individuals, and reduce social exclusion, the risk of crime, and the fear of crime</u></p> <p>Paragraph 6.30 For large <u>development proposals housing applications</u>, the extent of potential health impacts should be assessed through a Health Impact Assessment (HIA) to ensure that <u>the development will help to encourage healthy living, and adequate levels of healthcare services continue to be provided for the new development and community as a whole. The HIA should consider the demands that are placed upon the capacity of health services and facilities arising from the development. The assessment should also consider wider impacts and any unintended consequences on health and wellbeing for both current and future residents, including the ability to access to healthcare infrastructure. Where significant impacts are identified, planning permission will be refused unless infrastructure provision and/or funding to meet the health requirements of the development are provided.</u> Health Impact Assessments should be prepared in accordance with advice and best practice as published by the Department of Health and other agencies such as NHS North Essex, <u>and the Essex Planning Officers' Association. Health Impact Assessment should also be prepared and in line with the Council's Local List of Validation Requirements.</u></p> <p>Policy D 2, part D <u>D. All Use Class C2 developments and Use Class C3 development in excess of 50 units, or commercial development in excess of 1,000 sqm floor space will be required to prepare a Health Impact Assessment that will measure the wider impact upon healthy living and the demands that are placed upon the capacity of health services and facilities arising from the development. Where detrimental impact to health and wellbeing is identified, planning permission will be refused unless the impact can be mitigated through infrastructure provision and/or funding to meet the health requirements identified.</u></p>

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				<p>ECC position: ECC supports the changes as proposed to the Plan’s vision and objectives, plus that to Policy DM 9, with these considered as steps in the right direction.</p> <p>ECC remains of the view, as before, that the proposed approach to / treatment of, HIA requirements is not sound and that an over-arching policy for health & well-being is required (see representations and ECC statements on both of these matters for details)</p>
2	Overall – Place Shaping, Places, etc.	<p>3 – Effectiveness There is a recognised projected change in population demographics specifically in terms of older people within the Local Plan. However, there is no explicit reference as to how the planning process can support the wider health and well-being needs of the population (current and new). Healthcare infrastructure plays a role, however, the environment and design etc. have a very important influence in keeping populations healthy and this is not very apparent within the Local Plan. It currently does not make explicit reference to the requirements of the NPPF on supporting healthy communities or the social role of the plan making process to support this and it is unclear to Public Health on how this role will be fulfilled.</p>	<p>Add a strategy and content into the Local Plan that articulates how to meet these requirements. ECC recommends collaborative working prior to Local Plan submission between ECC (Public Health) and EFDC to set the form of wording which needs to address how the planning process can support the wider health and well-being needs of the population (current and new). A reference to the Essex Design Guide would assist in this regard which covers this topic.</p>	<p>EFDC position: See Representation Ref. 1 above</p> <p>ECC position: See ECC representations and statements on this; ECC suggests that adding a comprehensive (over-arching) policy and text, as ECC has suggested to EFDC, could address this representation</p>
65	Paragraphs 6.24 – 6.30 (Health) and Policy D 2	<p>3 – Effectiveness ECC is very positive about the inclusion of the role of Public Health in the Local Plan. ECC recommends that the HIA section in 6.30 and within Policy D2 mentions healthy environments. Health impacts are not solely based on access to healthcare infrastructure but the wider health impacts the development will have on health and wellbeing including issues such as employment, community cohesion, access to amenities etc. Limiting the HIA to healthcare infrastructure will not cover the aims of any HIA carried out. In addition, the Department of Health does</p>	<p>Refocus and reword Paragraphs 6.24 – 6.30 (Health) and Policy D 2 to remove the current focus dealing with health and HIA only on access to healthcare infrastructure. Also delete reference to Department of Health guidance on HIA. ECC recommends refocusing and rewording the current HIA element of paragraphs 6.24 – 6.30 (Health) and Policy D 2 (ECC Public Health can assist) to also mention healthy environments. This needs to recognise that health impacts are not solely based on access to healthcare infrastructure but the wider health impacts the development will have on health and wellbeing including issues such as employment, community cohesion, access to amenities etc.</p>	<p>EFDC position: See Representation Ref. 1 above</p> <p>ECC position: ECC remains of the view, as before, that the proposed approach to / treatment of, HIA requirements needs to be revised to ensure that this is sound. This could be addressed through an over-arching policy for health & well-being, as ECC has proposed to EFDC with suggested content and wording (see representations and ECC statements on these matters for details)</p>

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		not issue guidance on HIA - within Essex this is issued by Essex Planning Officers Association. It should also be considered as to who will be consulted on HIA- including guiding what is required, what the review process will be and provide advice and guidance on healthy environments generally. This has previously been a role of Public Health when based in the NHS. It is considered very important that this section is amended – ECC Public Health team would be happy to discuss this with EFDC planning team and advise accordingly.	ECC Public Health offers assistance on how this could usefully be revised. ECC proposes joint working with EFDC prior to Local Plan submission to agree an appropriate form of wording (in readiness) for the Planning Inspector’s consideration.	

Objections in relation to Highways and Employment

Representation Ref.	Policy	Objection on soundness 1- Positively prepared; 2 -Justified; 3- Effective; 4 - Consistent with National Policy	ECC proposed modifications	Agreed position
5	Paragraph 1.38	3 - Effectiveness This paragraph points out that travel to work is most commonly by car/van, a situation that needs to be addressed through policy considerations and actions such as those in the DfT report ‘Smarter Choices’ (examining and advocating ‘soft’ sustainable transport policy measures) rolled out across the existing population, and greater promotion of travel planning etc.	ECC recommends that a specific response is required in terms of addressing commuting, such as employment land provision / economic strategy; sustainable travel measures. This could potentially be addressed by allocating additional employment provision for the Harlow strategic sites, within Policy SP 4 and SP 5. ECC also recommended adding a reference in this paragraph to effective implementation through approaches explored through DfT’s ‘Smarter Choices’. See: https://www.gov.uk/government/publications/smarter-choices-main-report-about-changing-the-way-we-travel This representation cites an alternative approach to employment provision as one potential solution to the issue of ensuring that a positive shift is achieved to sustainable travel modes of 50/60 % for the Garden Town EFDC is proposing to allocate some 4,000 homes at Harlow’s edges but no equivalent provision for new jobs to be provided through new employment land in this location (more recently an intensified	EFDC position: The Local Plan allocates one hectare of employment land for B1a/B1b use at Dorrington Farm (RUR.E19) within the Latton Priory Garden Town Community. This new allocation combined with an existing one-hectare designation of employment land represents a significant opportunity for a comprehensive redevelopment of this site to deliver considerable new employment opportunities that are well integrated within Latton Priory as well as the wider Garden Town. The delivery of this site for B1a/B1b use fits with aspirations for the Garden Town and will deliver higher density employment uses at a sustainable location. The Local Plan also commits within Policies SP 2 and SP 5 that “other small-scale employment uses are expected to be provided as part of the development mix within the new Garden communities”, including within the local centres, education, community and health facilities, which will generate local employment generating opportunities. For further details in relation to employment provision for the Garden Communities please see the Council’s Hearing Statement on Matter 4 Issue 3 Question 1. ECC position: This matter has not been agreed

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			<p>employment development at Latton Priory is stated to be capable of providing some 1,200 jobs approximately) This does not reflect the Garden Communities approach of matching each new home with 1 (or more) new job, providing for balance, sustainability and self-containment</p> <p>The FEMA economic evidence assessed each district's own required job creation and employment land needs This did not deal with wider, cross boundary issues and therefore collective new job needs for the Garden Town in particular; that assessment work remains outstanding Similarly, the employment MOU does not address these matters As a result, Harlow Council is planning to meet the jobs growth and economic needs of its own population growth</p> <p>This spatial mismatch of new homes and new jobs has potential sustainability (including transport) implications. The transport modelling work carried out by ECC to date was necessary to assess the impacts of the 16,100 new homes for HGGT. This work (and its findings that the growth could be accommodated) was predicated on achieving the required ambitious 50 / 60% modal shift in favour of sustainable modes. This included assumptions that travel to work trips (these being a significant element of reasons to travel) would be enabled on a local basis, thus internalising many trips, which could be made using the new sustainable travel infrastructure planned for Harlow's network (STCs for example). If these trips instead involve travel further afield, being made by car instead, the impacts on the Harlow transport network become unmanageable and could serve to undermine achieving the success of the Garden Town more widely.</p> <p>EFDC is aware of the ambitious but challenging Garden Town sustainable travel targets issue and its importance. Equally, EFDC is aware that this requires a comprehensive planned package of transport interventions and measures. Along with the SHMA-wide MOU on distribution of objectively assessed housing needs (which explains the</p>	<p>This representation cites an alternative approach to employment provision as one potential solution to the issue of ensuring that a positive shift is achieved to sustainable travel modes of 50/60 % for the Garden Town EFDC is proposing to allocate some 4,000 homes at Harlow's edges but no equivalent provision for new jobs to be provided through new employment land in this location (more recently an intensified employment development at Latton Priory is stated to be capable of providing some 1,200 jobs approximately) This does not reflect the Garden Communities approach of matching each new home with 1 (or more) new job, providing for balance, sustainability and self-containment</p> <p>The FEMA economic evidence assessed each district's own required job creation and employment land needs This did not deal with wider, cross boundary issues and therefore collective new job needs for the Garden Town in particular; that assessment work remains outstanding Similarly, the employment MOU does not address these matters As a result, Harlow Council is planning to meet the jobs growth and economic needs of its own population growth</p> <p>This spatial mismatch of new homes and new jobs has potential sustainability (including transport) implications. The transport modelling work carried out by ECC to date was necessary to assess the impacts of the 16,100 new homes for HGGT. This work (and its findings that the growth could be accommodated) was predicated on achieving the required ambitious 50 / 60% modal shift in favour of sustainable modes. This included assumptions that travel to work trips (these being a significant element of reasons to travel) would be enabled on a local basis, thus internalising many trips, which could be made using the new sustainable travel infrastructure planned for Harlow's network (STCs for example). If these trips instead involve travel further afield, being made by car instead, the impacts on the Harlow transport network become unmanageable and could serve to undermine achieving the success of the Garden Town more widely.</p> <p>EFDC is aware of the ambitious but challenging Garden Town sustainable travel targets issue and its importance. Equally, EFDC is aware that this requires a comprehensive planned package of transport interventions and measures. Along with the SHMA-wide MOU on distribution of objectively assessed housing needs (which explains the agreement of located 16,100 homes at Harlow), EFDC is also a signatory to the MOU on Highways and Transport infrastructure. These encapsulate the collective key agreements</p>

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			agreement of located 16,100 homes at Harlow), EFDC is also a signatory to the MOU on Highways and Transport infrastructure. These encapsulate the collective key agreements around spatial growth and the shift in transport that is recognised as necessary.	around spatial growth and the shift in transport that is recognised as necessary. ECC acknowledges that a HGGT transport strategy is emerging, which is positive in principle and that work will be carried out to assess HGGT economic / jobs needs (on a cross border basis) but the current absence of findings from the latter mean that ECC cannot be assured at present that the Harlow transport network can accommodate the planned growth. Agreement not reached yet – resolution still required
8	Paragraph 2.29	3 - Effectiveness The MOUs do not yet include an agreed / signed MOU for employment distribution. The sustainability of, and reducing the need to travel for, Harlow and Gilston Garden Town may be affected by distribution of EFDC employment sites, which only include one small allocation in vicinity of Harlow (at Latton Priory). It was not possible for ECC to make this point at Regulation 18 consultation stage since employment land / economic requirements evidence and proposed site allocations in response were not prepared at that time. However, ECC has made this case through ongoing Duty to Co-operate working meetings.	Progress Employment Distribution MOU urgently, in partnership with the other FEMA LPAs and reflect in Local Plan and associated strategies prior to Local Plan submission. Add reference to this in paragraph 3.44.	See Representation Ref. 5 above ECC position: See representation Ref. 5 On this point, ECC notes that the planned employment MOU has been developed and signed but it deals only with agreeing the FEMA wide jobs growth numbers evidence and individual jobs growth requirements (within each district) and does not address cross-border Garden Town issues, requirements and need for self-containment that is identified for the HGGT Agreement not reached yet – resolution still required
9	Paragraph 2.31	3 - Effectiveness The Local Plan recognises the strategic economic role of Harlow. There needs to be consideration of whether the establishment of Public Health England and the Enterprise Zone employment growth would be sufficient to ensure that all the wider Harlow strategic sites can be sustainable within the wider Garden Town growth context, thus encouraging shorter, more sustainable travel to work opportunities. It was not possible for ECC to make this point at Regulation 18 consultation stage since employment land / economic requirements evidence and proposed site allocations in response were not	Work on the economic / employment land strategy (including that for the Garden Town) and approach to new employment land provision needs to be progressed through collaborative working between the LPAs and County Councils under Duty to Co-operate principles. EFDC needs to be satisfied that the economic / employment evidence base and transport modelling are responded to effectively through adequate spatial employment land provision for Harlow collectively, including the Harlow strategic sites. This may lead to a need for revisions to Policies SP 4 and SP 5. ECC recommends collaborative working on this with neighbouring LPAs and County Councils prior to Local Plan submission and the examination to identify how this could be addressed and to reflect transport modelling evidence.	See Representation Ref. 5 above ECC position: In particular, this representation cites: <ul style="list-style-type: none"> • Need for delivery of outstanding work on HGGT economic/ jobs needs; the evidence arising from transport modelling that requires a successful shift to sustainable travel modes (to 50/60%) and accordingly ensuring adequate local jobs provision (reachable by sustainable modes) for the additional, planned Garden Town population Agreement not reached yet – resolution still required

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		prepared at that time. However, ECC has made this case through ongoing Duty to Co-operate working meetings.		
10	Paragraph 2.72	3 - Effectiveness In line with the point made above, this paragraph refers to 'significant employment opportunities already exist at Harlow ... and further small-scale employment uses will also be provided with the Garden Town Communities to promote sustainable growth of Harlow and reduce out-commuting.' Consideration is needed of whether small-scale employment development would be sufficient to promote sustainable growth around Harlow – and if Harlow DC is able to provide sufficient jobs within their area, and the two major schemes - Public Health England and the Harlow Enterprise Zone) are enough to support economic needs of 16,000 additional homes.	It is recommended that collaborative work (between the Garden Town LPAs and County Councils) on the economic / employment land strategy and location of new employment land provision needs to be progressed revised (working through the Duty to Co-operate). This may require additional employment land provision for the Harlow strategic sites – meaning revisions to Policies SP 4 and SP 5. ECC recommends collaborative working on this prior to Local Plan submission - to enable preparation for the subsequent examination - in order to identify how this could be addressed and to reflect transport modelling evidence.	See Representation Ref. 5 above
15	Paragraph 2.111 – also paragraphs 2.112 & 2.113 & 2.117	3 - Effectiveness This states that the new Garden Town strategic sites will be offering 'locally accessible work' – in the absence of any substantial new employment allocations being proposed in the Local Plan on those sites located on the edges of Harlow, it would appear that the majority of the work opportunities to serve these are assumed to be within Harlow District Council's area.	It is recommended that collaborative work (between the Garden Town LPAs and County Councils) on the economic / employment land strategy and location of new employment land provision needs to be progressed revised (working through the Duty to Co-operate). This may require additional employment land provision for the Harlow strategic sites – meaning revisions to Policies SP 4 and SP 5. ECC recommends collaborative working on this prior to Local Plan submission - to enable preparation for the subsequent examination in order to identify how this could be addressed and to reflect transport modelling evidence.	See Representation Ref. 5 above
16	Paragraph 2.117	3 - Effectiveness	It is recommended that collaborative work (between the Garden Town LPAs and County Councils) on the	See Representation Ref. 5 above

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		<p>This states ‘The provision of sustainable transport options together with a significant modal shift from car to non-car use ... are central to the successful growth of the Garden Town. The Councils share an ambition to enhance established transport corridors and to create new travel corridors’ – the emphasis in the 2nd sentence should be on sustainable transport/travel corridors.</p> <p>It also states that ‘Provision of access to employment opportunities via non-car modes is critical ...’ – this emphasises the need to ensure that there are sufficient employment opportunities within close proximity to the Garden Town Communities to achieve modal shift.</p> <p>It also states that ‘The Councils aspire to see 60% of journeys to and from the Garden Town Communities to be made by non-car modes.’ This implies that it just applies to the four Garden Town Communities, but there is also the need for an overall step-change in travel for the whole Harlow and Gilston Garden Town, and reduction in need to travel, reduction in journey length, etc.</p>	<p>economic / employment land strategy and location of new employment land provision needs to be progressed and if necessary revised (working through the Duty to Co-operate). This may require additional employment land provision for the Harlow strategic sites – meaning revisions to Policies SP 4 and SP 5. ECC recommends collaborative working on this prior to Local Plan submission - to enable preparation for the subsequent examination in order to identify how this could be addressed and to reflect transport modelling evidence.</p>	
17	Policy SP 4	<p>3 – Effectiveness</p> <p>The Local Plan relies heavily on a step change in terms of sustainable travel and this is not fully addressed in the Local Plan. It is not evident to ECC that sufficient weight has been given to the need to provide sufficient employment for the Garden Town (and there is no signed MoU for this). Also ECC is not satisfied that studies and strategies carried out for future employment provision fully reflect this step change. The Garden Town will not be able to accommodate the overall planned levels of growth proposed sustainably unless more trips can be internalised and made</p>	<p>Revise content / supporting measures / strategies / actions for Policies SP 4 and SP 5 Review to ensure a sustainable travel step change. This may require a more cohesive approach towards Garden Town planning and delivery, working with partners. ECC recommends collaborative working with EFDC prior to Local Plan submission on the form that this could usefully be dealt with in wording and associated actions. This work will need to build on ongoing joint working between the LPAs and County Councils to ensure that the intended outcomes stated here can be realised effectively.</p>	See Representation Ref. 5 above

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		accessible through sustainable modes. Further joint working on cross-boundary employment provision tied with an analysis of the transport implications is required.		
18	Policy SP 4 B	3 Effectiveness As with the point made previously, this states that 'Development within the Garden Town Communities will be ... of sufficient scale ... to incorporate ... employment ... to enable residents has concerns as to whether the level of employment proposed at ('small-scale'), or in close proximity to these sites will be of sufficient scale to meet this policy objective.	The economic / employment land strategy and location of new employment land provision need to be reviewed through collaborative working (reflecting Duty to Co-operate). This will require additional employment land provision for the Harlow strategic sites – meaning possible revisions to Policies SP 4 and SP 5. ECC recommends collaborative working on this (with Garden Town LPAs, scheme promoters and County Councils) prior to Local Plan submission, to identify how this could be addressed and to reflect transport modelling evidence.	See Representation Ref. 5 above
21	Policy SP 4 / SP 5	3 - Effectiveness ECC (Highways) recommends adding to Policy SP5.3, which covers East Harlow, that as part of the delivery of this site, and other sites around Harlow, the provision of M11 J7a and associated infrastructure (in particular the east-west sustainable transport corridor) are prerequisites to all of these coming forward. This could possibly be dealt with through a single overarching statement.	<p>Revise wording of Policy SP5.3 to state that as part of the delivery of this site, and other sites around Harlow, the provision of M11 J7a and associated infrastructure (in particular the east-west sustainable transport corridor) are prerequisites to all of these coming forward. This could possibly be dealt with through a single overarching statement. ECC recommends joint working with EFDC prior to Local Plan submission to agree a form of wording.</p> <p>It will be necessary for key sustainable transport provision to be available when these strategic new developments are occupied (to prevent establishment of unsustainable travel behaviour). ECC recognises this might not be able to mean the entire E-W STC being in place but alternatives to private car (such as adequate bus provision / walking cycling provision will be necessary)</p> <p>ECC proposed modification:</p> <p><u>key transport interventions (such as M11 J7a and provision of sustainable transport (providing viable alternatives to the private car) will be required as prerequisites of this development being occupied. Measures to ensure future upkeep/ maintenance of sustainable transport provision will be required.</u></p>	<p>EFDC position:</p> <p>EFDC considers that the Local Plan, in particular the policy framework set out in Policy SP 4, is sufficiently robust with respect to the need for, and provision of, transport infrastructure.</p> <p>It has been agreed through a Memorandum of Understanding (EB1202) that site in and around Harlow should provide circa 16,100 new homes. The exact timing and phasing of developments and associated infrastructure provision should be a matter for respective masterplans and individual planning applications in order to maintain sufficient flexibility within the Planning Policy context as set out in Paragraph 11 of the revised National Planning Policy Framework i.e. that plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change.</p> <p>It should be noted that since the LPSV Regulation 19 consultation, the M11 J7a project has received planning permission and it is understood that initial site enabling works are already underway. It is expected that the project will be completed by 2020/21, prior to the delivery of the Garden Communities.</p> <p>ECC position:</p> <p>It will be necessary for key elements of sustainable transport provision to be available when these strategic new developments are occupied (to prevent establishment of unsustainable travel behaviour). ECC recognises this might not be able to mean the entire E-W STC being in place (when development commences)</p>

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				<p>but early alternatives to private car (such as adequate bus provision / walking cycling provision will be necessary).</p> <p>Two key points in relation to this are as follows:</p> <ul style="list-style-type: none"> • EFDC and ECC are signatories to the W Essex / E Herts Highways and Transport Infrastructure MOU (EB1201) the role of which is to set out the integrated package of critical transport interventions required to accommodate the HGGT growth, to which this representation refers • All these considerations are connected to achieving the required 60% step change in favour of sustainable travel modes for HGGT. This forms a critical means of the transport network growth mitigation identified and on which the growth is predicated <p>ECC proposed modification to the LPSV:</p> <p>New paragraph in Policy SP 4 and SP 5</p> <p><u>key transport interventions (such as M11 J7a and provision of sustainable transport (providing viable alternatives to the private car) will be required as prerequisites of this development being occupied. Measures to ensure future upkeep/ maintenance of sustainable transport provision will be required.</u></p>
24	Policy SP 5	<p>3 Effectiveness</p> <p>The Latton Priory development is to be located immediately south of Harlow. Concerns have been expressed (by ECC Highways) through the Plan-making process (through ongoing Duty to co-operate working groups meetings) on this proposal. ECC pointed out transport network concerns (as a result of transport modelling work) relating to this development at Regulation 18 consultation stage. The ECC comments pointed to the need to ensure effective delivery of an overall, integrated package of transport / sustainable transport interventions to ensure mitigation of impacts and to provide a broader range of benefits for the town's future. In particular, this proposal is still considered to be of insufficient size to enable it to support delivery of the high quality sustainable</p>	<p>Review available evidence, including site assessment findings, conclusions and development parameters (together with Garden Town LPAs, scheme promoters and County Councils). This is advised in response to the need to ensure deliverability of key sustainable transport measures (north-south sustainable transport corridor especially) and / or consider appropriate alternative means of corridor scheme delivery as appropriate. Review wording of Policies SP 4 and SP 5, if necessary, in response, to ensure that this development is of sufficient scale to deliver the level of funding required to deliver the sustainable transport corridors. ECC (Highways Authority) recommends joint working with EFDC prior to Local Plan submission to identify, through appropriate evidence, the parameters required to meet financial viability tests.</p>	<p>EFDC position:</p> <p>EFDC has commissioned Jacobs to undertake a study to identify and assess potential access arrangements for the Latton Priory site. The study is being progressed in consultation with a Steering Group including representatives from Harlow District Council, Essex County Council and Epping Forest District Council. In addition, Homes England are providing impartial 'critical friend' support to the process.</p> <p>As part of the study site specific transport modelling has been undertaken for the Latton Priory allocation site utilising the Harlow Strategic Model. Several potential access options have been identified and assessed. This includes various scenarios involving a mix of northern, eastern, southern and western access points. An assessment process was agreed, which is based on the site selection criteria used when assessing allocation sites for the Epping Forest District Local Plan (Submission Version) 2017. Access options were then assessed by Jacobs in consultation with the Steering Group against the agreed criteria.</p> <p>The initial modelling work and the assessments suggest that neither a northern or western access would be suitable as a primary access to the site and either an eastern or southern</p>

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		transport corridor envisaged as part of the overall strategy for the Garden Town. In addition the Local Plan does not show a direct link towards M11 J7. The combination of this is that it raises the issue of a need to review (the parameters and effectiveness of) this allocation in the way proposed due to impacts on Southern Way and associated routes.		<p>primary access would be required to ensure that there is not undue pressure placed on the existing highway system. There now needs to be additional consideration from the different stakeholders, including the developers, to decide on the most suitable and preferred access arrangements for the site. These access arrangements will then be incorporated into the emerging Strategic Masterplan for the site.</p> <p>ECC position:</p> <p>ECC advises that progress has been made through the ongoing work and discussions on the Latton Priory access road and that this is essentially agreed in principle. In terms of Local Plan revisions being proposed by EFDC, the details are still to be resolved and agreed</p> <p>Map 2.1 shows key ECC access requirement to be met for Latton Priory, with an indicative route shown (showing such an access indicatively on map 2.2 is less straightforward). But Policy SP 5F (xii) does not state this requirement.</p> <p>ECC maintains that the overall transport package for Harlow (as per Highways and Transport MOU) and key transport interventions relating to Latton Priory are essential for this development. ECC notes that work to explore solutions to ensure this delivery is ongoing but not concluded.</p> <p>ECC is open minded as to the potential solutions to ensure that the full transport measures package is ensured to address transport impacts from this proposal. The key test for ECC is the effectiveness of any option in achieving this</p>
26	Policy SP 5B	3 – Effectiveness ECC is not satisfied that there is sufficient evidence to support a case that there is adequate attractive employment within easy active/sustainable travel distance (of these proposed strategic developments) to ensure that the new Garden Town Communities will have their local employment needs met sustainably. This relates to ECC’s role as Highways authority.	It is recommended that collaborative work (between the Garden Town LPAs and County Councils) on the economic / employment land strategy and location of new employment land provision needs to be progressed and if necessary revised (working through the Duty to Co-operate). This may require additional employment land provision for the Harlow strategic sites – meaning revisions to Policies SP 4 and SP 5. ECC recommends collaborative working on this prior to Local Plan submission - to enable preparation for the subsequent examination in order to identify how this could be addressed and to reflect transport modelling evidence.	<p>ECC position:</p> <p>See representation Ref. 5 Agreement not reached yet – resolution still required</p>
28	Policy SP 5G (ix)	3 – Effectiveness This needs to also refer to contributions towards sustainable	Revise wording of Policy SP 5G (ix) to also refer to contributions towards sustainable travel corridors and their ongoing maintenance/upkeep. ECC (Highways) recommends joint working with EFDC	<p>EFDC position:</p> <p>See Representation Ref. 21 above</p>

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		travel corridors and their ongoing maintenance/upkeep.	prior to Local Plan submission (in readiness for the subsequent examination) to agree an appropriate form of wording.	<p>The delivery of the STC and its future maintenance is being developed and agreed through the Garden Town and the masterplanning works which are on-going.</p> <p>The Council accepts that Policy SP 5G(ix) should include reference to contributions towards sustainable transport corridors but considers it inappropriate to also refer to the ongoing maintenance/upkeep of the corridors.</p> <p>Proposed LPSV modification:</p> <p>Policy SP5 part G (ix)</p> <p>Highway and transport improvements including <u>contributions towards sustainable transport corridors</u>; works to Water Lane/A1169 roundabout; A1025/Abercrombie Way signals and traffic calming along the A1169 Southern Way Corridor;</p> <p>ECC position:</p> <ul style="list-style-type: none"> ECC welcomes this change and agrees that the first important point of this representation (contributions towards providing sustainable corridors) has been met by this change A reference to ensuring a means of upkeep / maintenance is also considered necessary (as part of the planning application / development process), although it is acknowledged that this might be dealt with appropriately through emerging HGGT stewardship arrangements
30	Policy SP 5H (xi) & (xiv) (E of Harlow)	3 - Effectiveness Highway and transport improvements: these also need to state a need for contributions towards on- and off-site sustainable direct linkages to key attractors within the Garden Town, and their ongoing maintenance/ upkeep, eg east-west sustainable transport corridor, including to employment sites, town centre and Town rail station, and high quality, attractive, direct bus services to encourage a step-change in modal shift.	Revise wording of Policy SP 5H (xi) & (xiv) to state a need for contributions towards on- and off-site sustainable direct linkages to key attractors within the Garden Town, and their ongoing maintenance/ upkeep, eg east-west sustainable transport corridor, including to employment sites, town centre and Harlow Town rail station, and high quality, attractive, direct bus services to encourage step-change in modal shift. ECC (Highways) recommends joint working with EFDC prior to Local Plan submission to agree a form of wording.	<p>EFDC position: See Representation Ref. 21 above</p> <p>ECC position:</p> <ul style="list-style-type: none"> ECC welcomes this change and agrees that the first important point of this representation (contributions towards providing sustainable corridors) has been met by this change A reference to ensuring a means of upkeep / maintenance is also considered necessary (as part of the planning application / development process), although it is acknowledged that this might be dealt with appropriately through emerging HGGT stewardship arrangements

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32	Map 2.2 (Latton Priory)	3 – Effectiveness The Masterplan area shows no highway connection across to B1393 Epping Road. Access via only Rye Hill Road would encourage use of a less suitable route to access B1393 (via Rye Hill Road, single track, passing places), and/or result in additional pressure on Southern Way.	Amend map 2.2 accordingly to include additional access point(s) for this development. ECC (Highways) recommends joint working with EFDC prior to Local Plan submission to agree the appropriate form of this.	<p>EFDC position:</p> <p>Indicative access point on to B1393 London Road is currently shown on Map 2.1 of the LPSV</p> <p>Site specific transport modelling has been undertaken for the Latton Priory allocation site utilising the Harlow Strategic Model and several potential access options have been identified and assessed tested. This includes various scenarios involving a mix of northern, eastern, southern and western access points. A scoring system was agreed, which is based on the site selection scoring used when assessing allocation sites for the Epping Forest District Local Plan (Submission Version) 2018. The four access options were then assessed scored by EFDC, HDC and ECC officers (collectively) against the agreed criteria.</p> <p>The initial modelling work and the scoring results assessments suggest that neither a northern or western access would be suitable as a primary access to the site and either an eastern or southern primary access would be required to ensure that there is not undue pressure placed on the existing highway system. There now needs to be additional consideration from the different stakeholders, including the developers, to decide on the most suitable and preferred access arrangements for the site. These access arrangements will then be incorporated into the emerging Strategic Masterplan for the site.</p> <p>ECC position:</p> <p>As with representation ref. 24 (above), ECC advises that progress has been made through the ongoing work and discussions on the Latton Priory access road and that this is essentially agreed in principle. In terms of Local Plan revisions being proposed by EFDC, the details are still to be resolved and agreed.</p> <p>Map 2.1 shows key ECC access requirement to be met for Latton Priory, with an indicative route shown (showing such an access indicatively on map 2.2 is less straightforward). But Policy SP 5F (xii) does not state this requirement.</p>
37	Paragraph 3.88	3 Effectiveness ECC (Highways) wishes to emphasise that there is still outstanding work to be done on the potential for improvements from Epping through to the M25 in particular and deliverability of some of the sustainable measures in the area of EFDC outside of the	Add a reference to Paragraph 3.88 to state a sustained and explicit commitment (within the Local Plan) to see this important work through to a satisfactory and clear conclusion. This work needs to be progressed substantially prior to Local Plan submission stage (in order to provide findings on necessary transport improvements and to avoid /	<p>ECC position:</p> <p>ECC is aware of current, ongoing progress on this transport assessment work (this being not completed yet); draft report outputs have been received and are being reviewed within ECC. This work requires continued commitment from EFDC to complete this work</p> <p>As this is a work in progress, an update will be provided for the Inspector for the examination hearings and this matter has been</p>

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		Garden Town. This affects the Epping Forest area in particular. ECC is aware this particular piece of work is ongoing. This will be affected by housing growth proposals for Epping and Loughton specifically.	mitigate adverse impacts on the Epping Forest SAC and its environmental quality / amenity).	addressed briefly within an early ECC hearings statement (Matter 4 Issue 6)
57	Policy P 6 F (North Weald Bassett)	2 - Justification In respect of North Weald Bassett – ECC (as Highways authority) continues to be concerned with the potential transport (and sustainability) impacts of this allocation on Epping as there are no mitigations currently included that will make sustainable travel an attractive proposition, for which purpose a study has been suggested to assess the potential for sustainable transport linking with Epping.	Add reference for Policy P 6F in the Local Plan to a firm need for and commitment to exploring and concluding on the feasibility of sustainable travel alternatives to private road / car transport for this area. This work needs to be progressed to a satisfactory extent (at least a draft stage) by the time of Local Plan examination.	<p>EFDC position:</p> <p>The Local Plan should be read as a whole and therefore any development at North Weald Bassett would have to comply with Policy T 1 of the LPSV. It is considered for the sake of clarity that the following modification should be made to the LPSV:</p> <p>Proposed LPSV modification: Policy P 6 (North Weald Bassett), new section before existing P:</p> <p><u>To support modal shift through providing for, and encouraging, more sustainable travel patterns, development proposals in North Weald Bassett must contribute toward integrated and sustainable transport solutions including walking and cycling, and public transport connectivity to the wider areas, including to Epping and Harlow.</u></p> <p>ECC position:</p> <p>The ECC stance on this issue remains as previously stated (in this representation). This has been reiterated since then. Addressing this requirement at Local Plan site allocation stage would be the most appropriate approach. This has not taken place. The next preference would be for the site developers to carry out this work as part of the masterplan exercise required by Policy P 6 (parts N. – P.). The last preference would be for this work to be delivered at planning application stage. The common point is that however this is to be addressed, the policy needs to clearly and explicitly state this requirement. This is to support development, explore necessary mitigation and ensure that developers / promoters understand a key evidence requirement for this area of proposed development.</p>

Objections in relation to other matters

Representation Ref.	Policy	Objection on soundness 1- Positively prepared; 2 -Justified; 3- Effective; 4 - Consistent with National Policy	ECC proposed modifications	Agreed position
14	Paragraph 2.107	3 - Effectiveness This paragraph suggests a new / changed approach towards the Garden Town. It states that ‘Harlow and Gilston Garden Town comprises four new Garden Town Communities’, but it actually ‘ comprises the whole of Harlow together with the adjoining strategic sites, comprising four new Garden Town Communities ...’.	ECC recommends reverting to previous approach and wording to ensure that a cohesive approach to Garden Town growth is achieved. This requires rewording to Policies SP 4 and SP 5, so that all references are to a single Garden Community, i.e. Harlow and Gilston Garden Town, instead of 4 individual Garden Communities.	<p>EFDC position:</p> <p>Proposed LPSV modification:</p> <p>Paragraph 2.107</p> <p>Harlow and Garden Town comprises <u>the whole of Harlow together with</u> four new Garden Communities:</p> <ul style="list-style-type: none"> - East of Harlow; - Latton Priory; - Water Lane Area; and - Gilston <p>ECC position:</p> <p>Agreement not reached yet – resolution still required. ECC welcomes EFDC’s revision proposal in principle. However, it is considered that this still contains ambiguity and does not yet provide a sufficiently clear expression of the coherence of a single Garden Town community concept and approach. Accordingly, ECC proposes a suggested form of revised wording and will send this to EFDC and Harlow Council for review (NB this would also require changes in ensuing text to bring that in line with the single Garden Community concept).</p> <p>It is suggested that the wording of this description of the HGGT might take the form of the following:</p> <p>Paragraph 2.107 Harlow and Gilston Garden Town <u>comprises the whole of Harlow, together with, four new neighbourhoods, planned on Garden Community principles, as follows:</u></p> <ul style="list-style-type: none"> - East of Harlow; - Latton Priory; - Water Lane Area; and - Gilston (<u>includes seven villages</u>)
38	Paragraph 4.69	3 - Effectiveness This paragraph references the NPPF however omits the locality specific design guidance as set out in the recently updated Essex Design Guide. It would strengthen the preamble to the policy by referring to existing design guidance.	Refer to the Essex Design Guide in paragraph 4.69.	<p>EFDC position:</p> <p>The EDG is not formally endorsed by the Council. While it is a useful document which will help to inform development proposals and decision making, the Council does not consider it necessary or appropriate for the LPSV to make specify reference to the EDG.</p> <p>ECC position:</p> <p>Although ECC point is acknowledged as advisory in nature, this is still considered helpful as a signpost to developers and applicants.</p>

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				<p>As EFDC suggests, EDG will help to inform development proposals and decision making (particularly in the absence of alternative design guidance covering all its content, including the newer content). The new content includes:</p> <ul style="list-style-type: none"> • Highways Technical Manual • Sustainable Urban Drainage Systems (SuDS) • Garden Communities • Local Authority Profiles • Plus new thematic content on: Ageing Populations; Digital & Smart Technology; Active Design; Health and Wellbeing <p>In addition, ECC suggests that the EDG does not need to be formally endorsed by EFDC to still be beneficial in application as good design advice. Accordingly, ECC maintains its position; therefore, agreement not reached yet – resolution still required Please note that this representation is related to ECC representation on Public Health matters, as the EDG contains useful information for developers etc. on health & wellbeing</p>

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