

Appendix 1 – Resolved 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	Agreed position
22	Paragraphs 2.125; 2.128; 2.129	3 – Effectiveness The Local Plan should not refer to a specific size of school in terms of forms of entry. Two form entry (2fe) primary schools are the ECC (as Education authority) preferred size but the final admission number will need to be set and reviewed in light of the precise numbers produced by these developments. The Local Plan should instead refer to a 2.1 hectare education site (D1), which will accommodate appropriate Primary School and Early Years and Childcare facilities. Without such flexibility the Local Plan is unsound. This relates to ECCs role as Local Education Authority.	Revise wording of Paragraphs 2.125; 2.128; 2.129 to refer to a 2.1 hectare education site (D1), which will accommodate appropriate Primary School and Early Years and Childcare facilities. Delete reference to numbers of forms of entry for school size.	<p>ECC agrees to withdraw this representation subject to the following:</p> <p>Proposed LPSV modification: Paragraph 2.125</p> <p>Sites within Latton Priory provide capacity for around 1,050 homes, alongside community facilities including Early Years facilities, a <del>new two form entry</del> primary school <u>(including the provision of land)</u> and appropriate contributions towards a secondary school (including the provision of land) to serve the needs arising from new development.</p> <p>Paragraph 2.128</p> <p>Sites within the Water Lane Area provide capacity for around 2,100 homes, alongside community facilities including Early Years facilities, a <del>new two form entry</del> primary school <u>(including the provision of land)</u> and appropriate contributions towards a secondary school to serve the needs arising from new development. In addition 0.5 ha for up to five traveller pitches will be provided.</p> <p>Paragraph 2.129</p> <p>East of Harlow is located across the administrative boundary between Harlow District Council and Epping Forest District Council. The land within the Epping Forest District provides capacity for 750 homes. Development is required to provide community facilities including Early Years facilities, a <del>two form entry</del> <u>new</u> primary school <u>(including the provision of land)</u> and appropriate contributions <del>(including the provision of land)</del> towards a new secondary school <u>(including the provision of land)</u> to serve the needs arising from new development. In addition 0.5 ha for up to five traveller pitches will be provided.</p>

Representation Ref.	Policy	Objection on soundness 1- Positively prepared; 2 -Justified; 3- Effective; 4 - Consistent with National Policy	ECC proposed modifications	Agreed position
				<p>Policy SP 5 part F point (viii)</p> <p>(viii) A <del>two-form entry</del> new primary school <u>with Early Years and Childcare provision on an education site of at least 2.1ha;</u></p> <p>Policy SP 5 part G point (v)</p> <p>(v) A <del>two-form entry</del> new primary school <u>with Early Years and Childcare provision on an education site of at least 2.5ha;</u></p> <p>Policy SP 5 part H point (vii)</p> <p>(vii) A <del>two-form entry</del> new primary school <u>with Early Years and Childcare provision on an education site of at least 2.1ha;</u></p>
25	Policy SP 5	3 - Effectiveness Land for education use must be listed as a separate and distinct land use i.e. class D1. In the absence of the specific areas required being allocated as D1, land owners will anticipate higher land values which will impact on viability and complicate the equalisation alluded to in SP 4 (xviii) (page 41).	Revise wording of Policy SP 5 so that land for education use is listed as a separate and distinct land use, i.e. class D1. Add references to use class D1 in the policy.	ECC agrees to withdraw this representation subject to the proposed wording changes for Policy SP 5 and supporting text (see objection Ref 22 above).
27	Policy SP 5 (various parts)	3 – Effectiveness These policies incorrectly refer specifically to ‘2 forms of entry schools’ rather than 2.1 hectare sites. Unlike in relation to secondary education elsewhere in the policy, no mention is made of the need for financial contributions towards education. This suggests that it would be acceptable for the developer to deliver the schools, which may be conflict with European Union competition/procurement (OJEU) rules. The policy also needs to make it clear that education land and the environment around new schools must meet the criteria set out in <u>ECC’s Developers’ Guide to Infrastructure Contributions</u> . Without the certainty that	<p>Revise wording of Policy SP 5 to delete reference to ‘2 forms of entry schools’, and instead state <u>‘2.1 hectare education sites, with Early Years and Childcare provision’</u>.</p> <p>Add reference to need for financial contributions for education.</p> <p>The policy also needs to make it clear that education land and the environment around new schools must meet the criteria set out in <u>ECC’s Developers’ Guide to Infrastructure Contributions</u>.</p>	<p>ECC agrees to withdraw this representation subject to the following:</p> <p>See Objection Reference 22 with regard to modification to Policy SP 5.</p> <p>The ECC’s Developer’s Guide to Infrastructure Contributions is already referred to in the LPSV under Policy D 2 Essential Facilities and Services.</p> <p><b>ECC position:</b> ECC supports the proposed wording changes for Policy SP 5 and supporting text (including identification of land for education use specifically) and these meet the first 2 points (see previous column) of this representation</p> <p>ECC also acknowledges that the EFDC proposed change to Policy D 1 would address the third point made here</p>

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		the policy will deliver suitable pieces of education land that can be used flexibly to mitigate the impact of the development, the Plan would be unsound. This relates to ECC's role as Education Authority.		and that reference to ECC Developers' Guide is provided alongside Policy D 2.
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.	ECC agrees to withdraw this representation following discussions at Local Plan hearing sessions – subject to EFDC, HDC and ECC agreeing an amendment to policy SP 5 to allow for alternative uses for the East of Harlow strategic site, so that if the planned secondary school does not prove to be best located in the EFDC part, then this could be provided within the Harlow part instead
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.	ECC agrees to withdraw this representation following discussions at Local Plan hearing sessions subject to EFDC making an amendment to refer to a 'Strategic site allocation' instead of just 'residential allocation'
34	Policy SP 6	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	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).	ECC agrees to withdraw this representation subject to the following amendment being made to the LP:  Proposed LPSV modification: New paragraph after 4.34  <u>A number of community and education sites in the District are located within areas designated as Green Belt. The Council acknowledges that due to the extent of the Green Belt in Epping Forest District, there may be instances where new buildings related to community or educational uses may be proposed (e.g., a new village hall or new buildings related to an existing school). In accordance with national planning policy such proposals will be considered inappropriate development which should not be</u>

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		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><u>approved within the Green Belt except in very special circumstances. As such community and educational facilities are generally considered to be essential uses within the District. When determining whether very special circumstances exist, a clear locational need for such facilities will be a material consideration that weighs in favour of granting planning permission and should be accorded appropriate weight."</u></p> <p>EFDC and ECC further agree that the resolution of ECC's objections as specifically referenced above do not require LPSV Policies D 2 or DM 4 to be amended.</p>
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 -same conclusion applies
36	Policy T 1	3 - Effectiveness ECC would seek to have a reference(s) included to safer routes to schools and establishing an attractive pedestrian environment around schools to encourage walking and cycling and reduce school run traffic included in this policy.	Add references in wording of Policy T 1 to safer routes to schools and establishing an attractive pedestrian environment around schools to encourage walking and cycling and reduce school run traffic to promote the sustainable / active travel agendas.	<p>Policy T 1 already requires development to provide safe suitable and convenient access and to promote sustainable transport modes. However, to provide further clarification the Council proposes to include the following modification:</p> <p>ECC agrees to withdraw this representation subject to the following:</p> <p>Proposed LPSV modification: Paragraph 6.23</p> <p>Education facilities should be provided in accessible locations. The Council will support proposals for dual use of school facilities and the joint provision and co-location of compatible facilities (such as education campuses or co-located sports or community facilities). <u>Development must also ensure</u></p>

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				<u>good accessibility to schools through the provision of safe, direct routes by sustainable / active modes of transport where feasible. The creation of a safe and attractive environment around schools will also be required.</u>
43	Policy P 1D (Epping)	3 - Effectiveness The policy text currently fails to list contributions to increase the number of secondary school places (at Epping St John's school).	Add reference to Policy P 1D to require developer contributions in order to increase the number of secondary school places (at Epping St John's school).	ECC agrees to withdraw this representation subject to the following:  Proposed LPSV modification:  Policy P 1 part D – new point  <u>(vii) appropriate contribution to increase the number of secondary school places.</u>
45	Policy P 1K (Epping)	3 - Effectiveness The need for a new primary school is correctly listed as a policy / masterplan requirement but the policy fails to allocate a 2.1 hectare (minimum) piece of suitable land to accommodate this (as set out in ECC's Developers' Guide to Infrastructure Contributions). The relocation of Ivy Chimneys primary school, as suggested here, has not been investigated and would require a larger site (than 2.1 ha) to accommodate both the existing pupils and the additional numbers generated by the planned growth. This relates to the ECC role as Education authority.	Add a reference to Policy P 1K to allocate a 2.1 hectare (minimum) piece of suitable land to accommodate this (as set out in ECC's Developers' Guide to Infrastructure Contributions). Increase larger size of site allocation for relocated Ivy Chimneys primary school. ECC recommends joint working with EFDC prior to Local Plan submission to establish and agree the appropriate size of site needed to meet requirements of the ECC Developers' Guide to Infrastructure Contributions.	ECC agrees to withdraw this representation subject to the following:  Proposed LPSV modification: Policy P 1, part K, point (iii)  <u>(iii) a new primary school and early years childcare provision (including land provision of a minimum of 2.1 hectares); which could be accommodated through the relocation of Ivy Chimneys Primary School);</u>
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 - same conclusion and change applies (in respect of change required to proposals map notation)
48	Policy P 2E (i) (Loughton)	3 - Effectiveness This criterion needs to read 'expansion of primary and secondary schools' rather than just secondary schools.	Revise Policy P 2E (i) to read ' <u>expansion of primary and secondary schools</u> ' (rather than just secondary schools).	ECC agrees to withdraw this representation subject to the following:  Proposed LPSV modification: Policy P 2 part E point (i)

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				(i) Expansion of <u>primary and</u> secondary schools in the local area;
50	Policy P 3F (i) (Waltham Abbey)	3 - Effectiveness Reference should not be made to 2 primary schools, as the replacement of temporary accommodation at Leverton school is also required. The policy also fails to mention the need to expand secondary school provision. As above, the policy should just refer to the need to expand primary and secondary schools, leaving the specific details (on number of FE) to the IDP. Mention is made under Policy P 3n para (v) but this is limited to the sites within the Waltham Forest North masterplan area.	Revise Policy P 3F (i) to delete reference to ‘2 primary schools’. Add reference to need to expand secondary school provision. The policy should just refer to the need to expand primary and secondary schools, leaving the specific details (on number of FE) to the IDP.	ECC agrees to withdraw this representation subject to the following:  Proposed LPSV modification: Policy P 3 part F point (i)  (i) Expansion of <del>two</del> <u>primary and secondary</u> schools within <u>the</u> Waltham Abbey Forecast Planning Group;
53	Policy P 4E (i) (Ongar)	3 – Effectiveness In line with comments made above, this should also read ‘expansion of primary and secondary schools’ (to include secondary school expansion).	Revise Policy P 4E (i) so that this also reads ‘ <u>expansion of primary and secondary schools</u> ’ (to include secondary school expansion).	ECC agrees to withdraw this representation subject to the following:  Proposed LPSV modification: Policy P 4 part D point (i)  (i)Expansion of <del>one of the</del> <u>primary and secondary</u> schools;  <b>ECC position:</b> ECC supports this proposed change and it meets this representation
56	Policy P 5C (page 139); Policy P 8C (page 152); Policy P 9C (page 155); Policy P 11D(page 161); Policy P 12E (page 164); Policy P 13F (page 173) and Policy P	3 - Effectiveness These are all missing any reference to necessary education infrastructure. Add ‘expansion of primary and secondary schools’ to relevant infrastructure lists. This comment applies to all allocations, to ensure they contribute to mitigating cumulative impact.	Revise Policy P 5C; Policy P 8C; Policy P 9C; Policy P 11D; Policy P 12E; Policy P 13F and Policy P 14D to include references to necessary education infrastructure. Add ‘ <u>expansion of primary and secondary schools</u> ’ to relevant infrastructure lists.	ECC agrees to withdraw this representation subject to the following:  Proposed LPSV modification: Policy P 5 part C [new point (iii)]  (iii) <u>Expansion of primary and secondary schools</u>  Policy P 8 part C [new point (iv)]  (iii) <u>Expansion of primary and secondary schools</u>  Policy P 9 part C [new point (iv)]

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	14D (page 175)			<p>(iv) <u>Expansion of primary and secondary schools</u></p> <p>Policy P 11 part D [new point (iv)]</p> <p>(iii) <u>Expansion of primary and secondary schools</u></p> <p>Policy P 12 part E [new point (iv)]</p> <p>(iii) <u>Expansion of primary and secondary schools</u></p> <p>Policy P 13 part F [new point (iii)]</p> <p>(iii) <u>Expansion of primary and secondary schools</u></p> <p>Policy P 14 part D [new point (iii)]</p> <p>(iii) <u>Expansion of primary and secondary schools</u></p>
57	Policy P 6 F (North Weald Bassett)	<p>2 - Justification</p> <p>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.</p>	<p>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>	<p>ECC agrees to withdraw this representation subject to the following:</p> <p>Proposed LPSV modification:</p> <p>A new paragraph after paragraph 5.99</p> <p><u>Sustainable Transport Choices</u>  <u>5.?? A key element to supporting the Vision for North Weald Bassett is to ensure that new development provides opportunities to access jobs, services, education and leisure opportunities through walking, cycling and public transport. Measures should provide viable alternatives to single occupancy private car use, and prevent the establishment of unsustainable travel behaviour. This will include the co-ordinated provision of safe and convenient sustainable routes to key destinations within, between and beyond the Masterplan areas, and maximising opportunities for existing residents within North Weald Bassett to benefit from new opportunities that the Masterplan areas provide without having to use their cars to ensure impacts on the wider road network are similar to existing traffic levels.</u></p>

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				<p><u>especially at sensitive locations in Epping</u>. In doing so it is recognised that sustainable access to Epping London Underground Station will continue to be needed and that <u>the more strategic focus for employment and service provision within Harlow should be recognised and reflected in the detailed sustainable transport infrastructure planning for North Weald Bassett. As well as the interventions identified more innovative sustainable solutions will be sought and the two Masterplan Areas should not be considered in isolation in developing co-ordinated sustainable transport choices opportunities.</u></p> <p>Please note: The point highlighted above (that was suggested by ECC) for this section is not agreed by EFDC. This is because this wording is considered to impose an unreasonable requirement in light of national planning policy.</p> <p>Policy P 6 new section after part E</p> <p>Sustainable Transport Choices ?. In accordance with Policy T 1, all development proposals must demonstrate include the need to make provision for, improve and promote use of links to/enhance existing, cycling and walking networks and access to passenger transport services. The Strategic Masterplans for North Weald Bassett and North Weald Airfield must incorporate measures to promote and encourage the use of sustainable methods of transportation and provide viable alternatives to private car use <u>to ensure impacts on the wider road network are similar to existing traffic levels, especially at sensitive locations in Epping</u>. Such measures are to be planned in consultation with Essex County Council (and relevant passenger transport providers) through the production of the Strategic Masterplans. The proposed measures need to be underpinned by feasibility evidence that demonstrates the delivery of modal shift away from single occupancy private car use by way of sustainable travel measures.</p> <p>Please note: The point highlighted above (that was suggested by ECC) for this section is not agreed by EFDC. This is because this wording is considered to impose an unreasonable</p>



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				<p>requirement in light of national planning policy and EFDC do not wish this to be included in the policy. This element therefore remains outstanding.</p> <p>Policy P 6 part F, two new bullet points after point (ii)</p> <p>(?) The provision of walking and cycling facilities, providing linkages both within the site and to external attractors;</p> <p>(?) Enhancements to public transport provision or other initiatives which reduce the need to travel by car;</p>
59	Policy P 6F (North Weald Bassett) and Policy P 10D + Map 5.12	<p>3 Effectiveness</p> <p>This does not list the need for contributions to increase the number of secondary school places to serve this area</p> <p>The need for a new primary school is correctly listed but the policy fails to allocate, as D1 use, a 2.1 hectare piece of suitable land for this purpose (as set out in ECC's Developers' Guide to Infrastructure Contributions).</p> <p>Map 5.12 needs to either show a suitable school site as a separate D1 land 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. This relates to ECC's role as Education authority.</p>	<p>Revise Policy P 6F (North Weald Bassett) and Policy P 10D + Map 5.12 to add need for contributions to increase the number of secondary school places to serve this area. Add reference in policies to allocate, as D1 use, a 2.1 hectare piece of suitable land for education use.</p> <p>Map 5.12 needs to either show a suitable school site as a separate D1 land 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.</p>	<p>ECC agrees to withdraw this representation subject to the following:</p> <p>Proposed LPSV modification: Policy P 6 part F point (i)</p> <p>(i) <u>A new primary school and early years childcare provision (including land provision of a minimum of 2.1 hectares), as well as contributions towards additional secondary school places;</u></p> <p>Policy P10 part D point (i)</p> <p>(i) <u>Primary school expansion and contributions towards additional secondary school places;</u></p>
60	Policy P 7C (Chigwell)	<p>3 Effectiveness</p> <p>The policy does not include the need for contributions to add primary school capacity. ECC also specifically identified and raised the need for replacement of existing temporary accommodation (by permanent accommodation) in this area as key to providing for the planned growth long term. This relates to ECC's role as Education authority.</p>	<p>Revise Policy P 7C to include reference to requiring additional primary school capacity, allowing for temporary accommodation replacement (in order to properly reflect ensuring adequate future education provision for locality).</p>	<p>ECC agrees to withdraw this representation subject to the following:</p> <p>Proposed LPSV modification: Policy P 7 part C point (i)</p> <p>(i) <u>Secondary school expansion; Expansion of primary and secondary schools</u></p>

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68	Policy P 1 (Epping)	Consequential changes resulting from discussions at Local Plan hearing sessions	Consequential changes resulting from discussions at Local Plan hearing sessions	<p>Proposed LPSV modification:</p> <p>A new paragraph after paragraph 5.23</p> <p><u>Sustainable Transport Choices</u>  <u>5.?? A key consideration for development proposals in Epping, including for the South Epping Masterplan Area, is to ensure that new development provides opportunities to access jobs, services, education and leisure opportunities through walking, cycling and public transport. This will include the provision of safe and convenient routes to key destinations, including to Epping London Underground Station. Measures should provide viable alternatives to private car use, and prevent the establishment of unsustainable travel behaviour. The proximity of Epping Station to the South of Epping Masterplan area is such that access to the station should be facilitated so as to promote sustainable transport choices and discourage private car use. In addition, the design and layout of development coming forward within the Masterplan area should maximise opportunities for residents and visitors to make internal trips by means other than the car.</u></p> <p>Policy P 1 new section after part C</p> <p><u>Sustainable Transport Choices</u>  <u>? . In accordance with Policy T 1, all development proposals must demonstrate opportunities to access jobs, services, education and leisure opportunities by means other than the car, both within Epping and to the Harlow and Gilston Garden Town will be provided and promoted. This will include the need to make provision for, improve and promote use of links to/enhance existing, cycling and walking networks and access to passenger transport services.</u></p> <p>Policy P 1 part D, two new bullet points after point (ii)</p> <p><u>(?) The provision of walking and cycling facilities, providing linkages both within the site and to external attractors;</u>  <u>(?) Enhancements to public transport provision or other initiatives which reduce the need to travel by car;</u></p>

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				<p>Policy P 1 new section after part L  <u>The Strategic Masterplan for South Epping must incorporate measures to promote and encourage the use of sustainable methods of transportation and provide viable alternatives to single occupancy private car use. Such measures are to be planned in consultation with Essex County Council (and relevant passenger transport providers) through the production of the Strategic Masterplan. The proposed measures need to be underpinned by feasibility evidence that comprehensively demonstrates the delivery of modal shift away from single occupancy private car use by way of sustainable travel measures to ensure impacts on the wider road network are similar to existing traffic levels, especially at sensitive locations in Epping Forest.</u></p> <p>Please note:                      The point highlighted above (that was suggested by ECC) for this section is not agreed by EFDC. This is because this wording is considered to impose an unreasonable requirement in light of national planning policy and EFDC do not wish this to be included in the policy. This element therefore remains outstanding.</p>

**Objections in relation to flood risk matters**

Representation Ref.	Policy	Objection on soundness 1- Positively prepared; 2 -Justified; 3- Effective; 4 - Consistent with National Policy	ECC proposed modifications	Agreed position
3	General Comment: SUDS (Chapter 4 – all water related policies / paragraph 4.97	3 - Effectiveness The Essex SuDS Design Guide should be added as key evidence for all water related policies. This was raised by ECC in its representation at the previous Regulation 18 Local Plan consultation. This relates to ECC as Lead Local Flood Authority.	Add reference(s) to Essex SuDS Design Guide in Local Plan Policies DM 15 – DM 19. Alternatively, this could go into the key evidence section at the start of this Local Plan topic (on page 98).	<p>The Council has streamlined the key evidence sections in the LPSV to only a small number of strategic documents. It is considered that the current wording in the LPSV i.e. paragraph 4.118, has given sufficient reference to relevant guidance provided by different organisations.</p> <p>ECC agrees to withdraw this representation subject to the following:</p> <p>Proposed LPSV modification:                      Paragraph 4.118</p>

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				Applicants will be expected to demonstrate that the SuDS will function effectively over the lifespan of the development, by ensuring adequate arrangements for their management and maintenance. Attention should be paid to the most up to date Technical Guidance from <u>the Council, Government; British Water, the Environment Agency and Essex County Council- including the Essex SuDS Design Guide</u>
4	General Comment: flood risk evidence base / paragraph 4.97	3 - Effectiveness The Environment Agency Risk of Flooding from Surface Water Maps (RoFSW) should be added as a key part of the evidence base.	Add reference to the Environment Agency Risk of Flooding from Surface Water Maps (RoFSW) in the key evidence section at the start of this Local Plan topic (on page 98).	ECC agrees to withdraw this representation subject to the following:  Proposed LPSV modification: Paragraph 4.106  A Surface Water Management Plan outlines the predicted risk and preferred surface water management strategy for areas under study. They identify local Critical Drainage Areas (CDAs) and site specific measures that could help reduce the risk of surface water flooding in these areas. The Council currently has in place one Surface Water Management Plan (SWMP) for Loughton, Buckhurst Hill and Theydon Bois. Further SWMPs may be produced for other areas. <u>Development proposals should also take into account the Environment Agency Risk of Flooding from Surface Water Maps (RoFSW).</u>
23	Policy SP 5	3 Effectiveness Section (xvi) – Future surface water run-off from the site (and development) into Pincey Brook needs to be restricted to no more than existing rates. It must also be ensured that any increased volumes of water discharging into the Pincey Brook are mitigated against. This relates to ECCs role as Lead Local Flood Authority.	Add text as follows: xvi) Measures to ensure the protection of the functional flood plain and restriction of surface water run-off from the site into Pincey Brook to no more than existing rates <u>and where possible existing volumes. In order to mitigate any increased volumes, discharge rates should either be limited to the 1 in 1 greenfield rate or long term storage.</u>	ECC agrees to withdraw this representation subject to the following:  Proposed LPSV modification: Policy SP 5, part H point (xvi)  Measures to ensure the protection of the functional flood plain and restriction of surface water run-off from the site into Pincey Brook to no more than existing rates <u>and where possible existing volumes. In order to mitigate any increased volumes, discharge rates should either be limited to the 1 in 1 greenfield rate or provide long-term storage.</u>
41	Policy DM 15	4 – Consistency with national policy	Include changes to Policy DM 15 as outlined in Footnote 20 of the NPPF.	ECC agrees to withdraw this representation subject to the following:

Representation Ref.	Policy	Objection on soundness 1- Positively prepared; 2 -Justified; 3- Effective; 4 - Consistent with National Policy	ECC proposed modifications	Agreed position
		<p>Part C of policy is not clearly in line with National Policy.</p> <p>Part C of DM 15 is not clear and suggests that a Flood Risk Assessment should only be submitted for sites in Flood Zone 2 and 3. In line with Footnote 20 of the NPPF Flood Risk Assessments should also be submitted in these instances:</p> <p>20 A site-specific flood risk assessment is required for proposals of 1 hectare or greater in Flood Zone 1; all proposals for new development (including minor development and change of use) in Flood Zones 2 and 3, or in an area within Flood Zone 1 which has critical drainage problems (as notified to the local planning authority by the Environment Agency); and where proposed development or a change of use to a more vulnerable class may be subject to other sources of flooding.</p> <p>Part E of the policy - It is also the expectation of ECC as LLFA that any development that is considered 'major' is supported by a site-specific Drainage strategy.</p>	<p>Make reference that any major development should be supported by a site-specific drainage strategy.</p>	<p>Proposed LPSV modification: Policy DM 15, part C</p> <p><u>In line with national policy and guidance, relevant development proposals within Flood Zones 2 and 3a must be informed by a site specific Flood Risk Assessment (FRA) taking account of all potential sources of flooding and climate change allowances and should:</u></p>
42	Policy DM 16	<p>3 - Effectiveness</p> <p>Part D (iv) suggests that for all development where the greenfield runoff rate cannot be achieved justification must be provided to demonstrate that the run-off rate has been reduced as much as possible. No indicator of what would justify a particular reason not to limit discharge rates to greenfield has been given. There is a concern that this would allow developers to avoid their responsibility.</p> <p>Part D (i) and (ii) These sections talk about requirements when discharging into a sewer. These requirements should also be when sites are discharging to a watercourse</p>	<p>Provide more detail in Policy DM 16 as to what would constitute a reason not to restrict to greenfield runoff rate and demonstrate that an increased run-off rate would not substantially increase flood risk.</p> <p>Incorporate revised wording as follows:</p> <p><u>'In order for a run-off rate to be considered impracticable it would be necessary to demonstrate that there are specific site constraints or that discharge rates set at greenfield run-off rate would render the whole development financially unviable. Evidence in the form of a viability assessment should be provided to support this. It should be demonstrated that an increased run-off rate would not substantially increase flood risk.'</u></p> <p>Part D (i) and (ii): (i) all major development proposals will be required to reduce surface water flows to the 1 in 1 greenfield run-off rate and provide storage for all events up to and including the 1 in 100 year critical storm event including an allowance for</p>	<p>ECC agrees to withdraw this representation subject to the following:</p> <p>Proposed LPSV modification: Policy DM 16, part D point (i) and (ii)</p> <p>(i) all major development proposals will be required to <u>submit a Drainage Strategy which demonstrates how the proposed development will reduce surface water flows to the 1 in 1 greenfield run-off rate and provide storage for all events up to and including the 1 in 100 year critical storm event including an allowance for climate change, and include at least one source control SuDS measure, resulting in a net improvement in water quantity and quality discharging from the site to a sewer and/or a watercourse</u></p> <p>(ii) all brownfield development proposals should aim to achieve the 1 in 1 greenfield run-off rate and, at a minimum, achieve a 50 per cent reduction in existing site run-off rates for all events, including an allowance for climate change, SuDS measures resulting in a net improvement in water quantity and quality discharging <u>from the site to a sewer and/or a watercourse;</u></p>

Representation Ref.	Policy	Objection on soundness 1- Positively prepared; 2 -Justified; 3- Effective; 4 - Consistent with National Policy	ECC proposed modifications	Agreed position
			<p>climate change, and include at least one source control SuDS measure, resulting in a net improvement in water quantity and quality discharging <i>from the site</i>;</p> <p>(ii) all brownfield development proposals should aim to achieve the 1 in 1 greenfield run-off rate and, at a minimum, achieve a 50 per cent reduction in existing site run-off rates for all events, including an allowance for climate change, SuDS measures resulting in a net improvement in water quantity and quality discharging <i>from the site</i>;</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
7	Paragraph 2.27 (Vision and Objectives) – part C	<p>3 - Effectiveness</p> <p>The consideration of health expressed through the Local Plan objectives is around walking and cycling opportunities and mention is made of access to green space and leisure (without reference to health opportunities) under infrastructure and movement. ECC (Public Health) supports this, however - as per the points made by ECC previously (as above) on supporting the NPPF - these objectives do not appear to fulfil 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 ECC Public Health) how this role will be fulfilled. Examples of positive local formal and informal green space assets and the considerable recreational opportunities afforded include access to: Epping Forest; Lee Valley Regional Park; North Weald; nearby country parks; the rights of way network and ancient footpaths; and the health benefits offered by these.</p>	<p>ECC recommends that content is added to the Local Plan objectives (paragraph 2.27 part C) to ensure meeting NPPF health / well-being requirements around the Local Plan strategy for improving health and well-being. This will need collaborative working prior to Local Plan submission between ECC (Public Health) and EFDC to set the form of wording and this needs to address how the planning process can support the wider health and well-being needs of the population (current and new).</p> <p>Amend vision to include the following:</p> <p>‘a need for developments to support healthy living through their design, providing opportunities for physical activity, access to quality open spaces and employment opportunities.’</p>	ECC agrees to withdraw this representation subject to changes proposed under Representation Reference 1 in Appendix 2

		In a related vein, ECC (Public Health) recommends that ‘healthy living’ is included in the vision for EFDC to 2033. This could be in the form of ‘a need for developments to support healthy living through their design, providing opportunities for physical activity, access to quality open spaces and employment opportunities.’		
40	Policy DM 9 / Paragraph 4.70	3 - Effectiveness This paragraph (4.70) discusses healthy places but this consideration is then not mentioned in the associated policy. Accordingly, ECC (Public Health) seeks a change so that health is also mentioned in Policy DM 9.	Add wording to Policy DM 9 to reflect wording of Paragraph 4.70, so that the policy also refers to healthy places.	ECC agrees to withdraw this representation subject to changes proposed under Representation Reference 1 in Appendix 2

**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
6	Paragraph 1.44 12 <sup>th</sup> point	3 - Effectiveness Addressing transport needs of current and future populations – there is a need to change behaviour to positively influence perceptions with regard to the need to travel, and travel modes, towards more active/sustainable travel.	ECC (Highways) recommends that a specific response is required in terms of delivering the step change towards sustainable travel. This could be addressed by measures such as the planned sustainable transport corridors. These need to be demonstrably deliverable. ECC recommends changing the emphasis of this paragraph so that its focus addresses changing travel behaviour and sustainable transport. To address this, ECC proposes collaborative working with EFDC prior to Local Plan submission to agree an appropriate form of wording.	ECC agrees to withdraw this representation subject to the following:  Proposed LPSV modification: Paragraph 1.44 - New bullet point after the 12th point  <u>- To enable the step change that is required for a modal shift towards more sustainable transport patterns and sustainable travel behaviour;</u>
11	Paragraph 2.82	3 - Effectiveness ‘National planning policy states that... new or changing places should ... encourage ease of movement’ – NPPF states that ‘Plans ... should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable modes can be maximised’ (paragraph 34); and ‘Planning policies should aim for a balance of land uses within their area so that people can be	Revise paragraph 2.82 to include the following words ‘encourage ease of movement <u>by active/sustainable modes</u> ’.	ECC agrees to withdraw this representation subject to the following:  Proposed LPSV modification: Paragraph 2.83  National planning policy emphasises the importance of high quality design and place shaping. It states that well designed places exhibit qualities that benefit users and the wider area. Development should ensure that new or changing places: are functional; support mixed uses and tenures; include successful public spaces; are adaptable and resilient; have a distinctive character; are

Representation Ref.	Policy	Objection on soundness 1- Positively prepared; 2 -Justified; 3- Effective; 4 - Consistent with National Policy	ECC proposed modifications	Agreed position
		encouraged to minimise journey lengths for employment ...' (paragraph 37). Suggest that 'encourage ease of movement' be amended to 'encourage ease of movement by <i>active/sustainable modes</i> '.		attractive; and encourage ease of movement by <u>active/sustainable modes</u> .
12	Policy SP 3, part A (iv)	3 - Effectiveness This refers to a need to 'ensure a robust range of employment opportunities with a variety of jobs within easy commuting distance of homes. However the term 'easy commuting distance' makes no reference to the need for this to be by sustainable / active modes in preference to single occupancy car use.	Revise Policy SP 3 part A (iv) to state the need to ' <u>ensure a robust range of employment opportunities with a variety of jobs within easy commuting distance of homes is to be by sustainable / active modes in preference to single occupancy car use</u> '. ECC recommends collaborative working prior to Local Plan submission between ECC (Highways Authority) and EFDC on precise wording.	ECC agrees to withdraw this representation subject to the following:  Proposed LPSV modification: Policy SP 3 part A point (iv)  (iv) ensure a robust range of employment opportunities with a variety of jobs within easy commuting distance of homes <u>by sustainable / active transport modes in preference to single occupancy car use</u> ;
13	Policy SP3 Place Shaping A (xiii)	3 - Effectiveness This refers to a need to 'provide for sustainable movement and access ...' On this, ECC (Highways) suggests amending to 'provide for <u>and actively promote</u> sustainable movement and access ...'	Revise wording of Policy SP 3 Place Shaping A (xiii) so that it states to 'provide for <u>and actively promote</u> sustainable movement and access ...'.	ECC agrees to withdraw this objection subject to the following:  Proposed LPSV modification: Policy SP 3 part A point (xiii)  (xiii) provide for <u>and actively promote</u> sustainable movement and access to local and strategic destinations (including rail, bus and pedestrian/cycling); and
19	Policy SP 4 C (xii)	3 - Effectiveness ECC (Highways) recommends amending this as follows: 'to create a step change in modal shift through providing for, <u>encouraging and actively promoting</u> more sustainable travel patterns;' ECC reinforces this by adding that the reference (in Local Plan paragraph 2.117) that 'The Councils aspire to see 60% of journeys to and from the Garden Town Communities to be made by non-car modes' is acknowledged by these Councils to be a challenging (but necessary) target. Accordingly, ECC needs to seek to	Revise wording of Policy SP 4 C (xii) as follows: 'to create a step change in modal shift through providing for, <u>encouraging and actively promoting</u> more sustainable travel patterns;'	ECC agrees to withdraw this representation subject to the following:  Proposed LPSV modification: Policy SP 4 section C point (xii)  Ensure the provision of integrated and sustainable transport systems for the Harlow and Gilston area that put walking, cycling and public transit networks and connections at the heart of growth in the area, to create a step change in modal shift through providing for, <u>and encouraging and actively promoting</u> more sustainable travel patterns;



Representation Ref.	Policy	Objection on soundness 1- Positively prepared; 2 -Justified; 3- Effective; 4 - Consistent with National Policy	ECC proposed modifications	Agreed position
		ensure that the policy wording is as clear and positive as possible in the interests of delivering the best possible prospects of success in achieving this objective.		
20	Policy SP 4 C (xiii)	<p>3 - Effectiveness ECC (Highways) recommends amending this to include ‘<i>reducing single occupancy car use</i>’, as this would also help to reduce congestion, and help to improve air quality and reduce emissions. ECC reinforces this by adding that the reference (in Local Plan paragraph 2.117) that ‘The Councils aspire to see 60% of journeys to and from the Garden Town Communities to be made by non-car modes’ is acknowledged by these Councils to be a challenging (but necessary) target. Accordingly, ECC needs to seek to ensure that the policy wording is as clear and positive as possible in the interests of delivering the best possible prospects of success in achieving this objective.</p>	<p>Revise wording of Policy SP 4 C (xiii) this to include ‘<i>reducing single occupancy car use</i>’, as this would also help to reduce congestion, and help to improve air quality and reduce emissions.</p>	<p>ECC agrees to withdraw this objection subject to the following:  Proposed LPSV modification: Policy SP 4 section C point (xiii)  Contribute to the delivery of the Sustainable Transport Corridors and the establishment of an integrated, accessible and safe transport system which maximises the use of the sustainable transport modes of walking, cycling, and the use of public and community transport <u>and reducing single occupancy car use</u> in order to improve air quality and reduce emissions and promote healthy lifestyles. Garden Town Communities must ensure the provision of high quality, safe and direct walking and cycling routes and linkages to and from Harlow within a permeable site layout with priority over vehicular traffic;</p>
21	Policy SP 4 / SP 5	<p>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>	<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.  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)  ECC proposed modification:</p>	<p>ECC agrees to withdraw this objection subject to the following:  Proposed LPSV modification: Policy SP 4 section C, new point after (xix)  <u>(?) Key transport interventions (such as M11 J7a) and provision of appropriate sustainable travel options will be required at the point of first occupation within the Garden Town Communities in order to encourage and facilitate sustainable travel behaviour from the outset and to provide viable alternatives to single-occupancy private car use. Measures to ensure future upkeep/ maintenance of sustainable transport provision will be required.</u></p>

Representation Ref.	Policy	Objection on soundness 1- Positively prepared; 2 -Justified; 3- Effective; 4 - Consistent with National Policy	ECC proposed modifications	Agreed position
			<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>	
28	Policy SP 5G (ix)	3 – Effectiveness This needs to also refer to contributions towards sustainable travel corridors and their ongoing maintenance/upkeep.	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 prior to Local Plan submission (in readiness for the subsequent examination) to agree an appropriate form of wording.	See Representation Ref. 21 above - ECC agrees to withdraw this objection subject to the agreed changes being made
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.	See Representation Ref. 21 above - ECC agrees to withdraw this objection subject to the agreed changes being made
31	Policy SP 5.3	3 - Effectiveness Policy SP 5.3 states “The delivery of works to widen the B183 Gilden Way, a left turn slip road from M11 Junction 7A link road approach to the East Harlow northern access road ahead of development commencing;” ECC is unaware of where the provision of a ‘left turn slip road’ has come from. This stated measure is too specific and not a solution currently being proposed. This detailed matter will need to be determined at detailed design / planning application stage in terms of what the more specific layouts and accesses will be. This relates to ECC’s role as Highways authority.	Delete the reference to “ <del>The delivery of works to widen the B183 Gilden Way, a left turn slip road from M11 Junction 7A link road approach to the East Harlow northern access road ahead of development commencing;</del> ” and replace with ‘ <u>suitable accesses will need to be agreed with the highway authority</u> ’.	ECC agrees to withdraw this objection subject to the following:  Proposed LPSV modification: Policy SP 5 part H point (xii)  <u>The delivery of works to widen the B183 Gilden Way, a left turn slip road from M11 Junction 7A link road approach to the East Harlow northern access road ahead of development commencing; Suitable highway improvements to be agreed with the highway authority;</u>

Representation Ref.	Policy	Objection on soundness 1- Positively prepared; 2 -Justified; 3- Effective; 4 - Consistent with National Policy	ECC proposed modifications	Agreed position
44	Policy P 1D (iii) (Epping)	3 - Effectiveness ECC recommends that this also includes a reference to <i>'new and improved pedestrian/cycle links to key attractors'</i> .	Revise wording of Policy P 1D (iii) so that it also includes a reference to <u>'new and improved pedestrian/cycle links to key attractors'</u> .	ECC agrees to withdraw this representation subject to the following:  Proposed LPSV modification:  Policy P 1 part D new point after point (iii)  (X) <u>Improved pedestrian / cycle links;</u>
46	Policy P 1K (vi) (Epping)	3 - Effectiveness ECC recommends that this also includes a reference to <i>'and improvements to the local walk/cycle network to encourage and promote more sustainable travel.'</i>	Revise wording of Policy P 1K (vi) to include a reference to <u>'and improvements to the local walk/cycle network to encourage and promote more sustainable travel.'</u>	ECC agrees to withdraw this representation subject to the following:  Proposed LPSV modification: Policy P 1 part K new point after point (v)  (X) <u>improvements to the local walking/cycling network;</u>
49	Policy P 2E (iii) (Loughton)	3 - Effectiveness ECC recommend that this also includes a reference to <i>'new and improved pedestrian /cycle links to key attractors'</i> .	Revise wording of Policy P 2E (iii) to include a reference to <u>'new and improved pedestrian /cycle links to key attractors'</u> .	ECC agrees to withdraw this representation subject to the following:  Proposed LPSV modification: Policy P 2 part E, new point after point (iii)  (X) <u>Improved pedestrian / cycle links;</u>
51	Policy P 3F (iii) (Waltham Abbey)	3 - Effectiveness ECC recommends that this also includes a reference to <i>'new and improved pedestrian /cycle links to key attractors'</i> .	Revise Policy P 3F (iii) to include a reference to <u>'new and improved pedestrian /cycle links to key attractors'</u> .	ECC agrees to withdraw this representation subject to the following:  Proposed LPSV modification: Policy P 3 part F, new point after point (iii)  (X) <u>Improved pedestrian / cycle links;</u>
54	Policy P 4E (ii) (Ongar)	3 – Effectiveness ECC recommends that this also includes a reference to <i>'new and improved pedestrian /cycle links to key attractors'</i> .	Revise Policy P 4E (ii) so that this also includes a reference to <u>'new and improved pedestrian /cycle links to key attractors'</u> .	ECC agrees to withdraw this representation subject to the following:  Proposed LPSV modification: Policy P 4 part D, new point after point (ii)  (X) <u>Improved pedestrian / cycle links;</u>
55	Policy P 5 C (i) Buckhurst Hill	3 – Effectiveness ECC recommends that this also includes <i>'and improvements to the local walk/cycle network to encourage and promote more sustainable travel.'</i>	Revise Policy P 5 C (i) so that this also includes <u>'and improvements to the local walk/cycle network to encourage and promote more sustainable travel.'</u>	ECC agrees to withdraw this representation subject to the following:  Proposed LPSV modification: Policy P 5 part C, new point after point (i)

Representation Ref.	Policy	Objection on soundness 1- Positively prepared; 2 -Justified; 3- Effective; 4 - Consistent with National Policy	ECC proposed modifications	Agreed position
				(X) <u>Improved pedestrian / cycle links;</u>
58	Policy P 6 (iii) (North Weald Bassett)	3 - Effectiveness ECC recommends that this also includes ' <i>and improvements to the local walk/cycle network to encourage and promote more sustainable travel.</i> '	Revise Policy P 6 (iii) so that this also includes ' <i>and improvements to the local walk/cycle network to encourage and promote more sustainable travel.</i> '	ECC agrees to withdraw this representation subject to the following:  Proposed LPSV modification: Policy P 6 part F, new point after point (iii)  (X) <u>Improved pedestrian / cycle links;</u>
61	Policy P 7C (ii) (Chigwell)	3 Effectiveness ECC recommends this this also includes ' <i>and improvements to the local walk/cycle network to encourage and promote more sustainable travel.</i> '	Revise Policy P 7C (ii) so that this also includes ' <i>and improvements to the local walk/cycle network to encourage and promote more sustainable travel.</i> '	ECC agrees to withdraw this representation subject to the following:  Proposed LPSV modification: Policy P 7 part C, new point after point (ii)  (X) <u>Improved pedestrian / cycle links;</u>
62	Policy P 8C (i) Theydon Bois	3 Effectiveness ECC recommends this this also includes ' <i>and improvements to the local walk/cycle network to encourage and promote more sustainable travel.</i> '	Revise Policy P 8C (i) so that this also includes ' <i>and improvements to the local walk/cycle network to encourage and promote more sustainable travel.</i> '	ECC agrees to withdraw this representation subject to the following:  Proposed LPSV modification: Policy P 8 part C, new point after point (i)  (X) <u>Improved pedestrian / cycle links;</u>
63	Policy P 9 (i) Roydon	3 Effectiveness ECC recommends this this also includes ' <i>and improvements to the local walk/cycle network to encourage and promote more sustainable travel.</i> '	Revise Policy P 9C (i) so that this also includes ' <i>and improvements to the local walk/cycle network to encourage and promote more sustainable travel.</i> '	ECC agrees to withdraw this representation subject to the following:  Proposed LPSV modification: Policy P 9 part C, new point after point (i)  (X) <u>Improved pedestrian / cycle links;</u>

**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
35	Paragraph 3.46 (and Policy E 1)	3 - Effectiveness Paragraph 3.46 on page 64 suggests that if an employment site is not to be retained for employment use anymore that the site should be effectively	Review the available evidence and revise wording of Paragraph 3.46 (and Policy E 1) in response as appropriate to refer to an extended duration requirement for marketing vacant employment sites. This is likely to require a broader,	The LPSV already requires a 12-month marketing period under Policy E 1. No change necessary to the LPSV.  ECC agrees to withdraw this representation accordingly.

Representation Ref.	Policy	Objection on soundness 1- Positively prepared; 2 -Justified; 3- Effective; 4 - Consistent with National Policy	ECC proposed modifications	Agreed position
		<p>marketed for a minimum of 6 months. ECC has concerns that this is too short a period of time given the significant residential value of land in the district. As a result, ECC considers that the current proposed approach is unlikely to prove effective in protecting employment sites from residential re-use proposals. The suggestion accordingly is that this should be increased in line with other districts to a minimum of 12 months, if not 2 years - if possible. This policy should also be complemented with the requirement for further evidence to demonstrate that the suggested site would no longer be viable for employment uses. This relates to ECC's Economic Growth function.</p>	<p>collaborative review of the policy approach to (and practise on) employment sites protection. ECC recommends joint working with EFDC prior to Local Plan submission to agree an approach and form of wording.</p>	
64	Policy D 1	<p>3 - Effectiveness This policy partly reflects an ECC recommended model Infrastructure policy (developed as best practice) but differs in some adverse ways. ... The text as previously put forward by ECC at the Regulation 18 consultation stage stating that <i>'Developers and land owners must work positively with the Council, neighbouring authorities and other infrastructure providers throughout the planning process to ensure that the cumulative impact of development is considered and then mitigated, at the appropriate time, in line with their published policies and guidance'</i> has been removed, to the detriment of the policy's effectiveness.</p>	<p>Revise Policy D 1 to incorporate revised wording as recommended (ECC best practice policy assists in ensuring this meets infrastructure requirements fully). This needs to state that <i>'Developers and land owners must work positively with the Council, neighbouring authorities and other infrastructure providers throughout the planning process to ensure that the cumulative impact of development is considered and then mitigated, at the appropriate time, in line with their published policies and guidance'</i>.</p>	<p>ECC agrees to withdraw this representation subject to the following:  Proposed LPSV modification: new part H of Policy D 1  <u>Developers and land owners must work positively with the Council, other local authorities and infrastructure providers throughout the planning process to ensure that the cumulative impact of development is considered and then mitigated, at the appropriate time, in line with published policies and guidance'</u>.</p>
66	Appendix 3 (1 <sup>st</sup> set of Monitoring Indicators)	<p>3 - Effectiveness Monitoring indicators 'changes in travel to work patterns, flows and mode of transport' - this indicator is for Journeys to Work only. Accordingly, ECC advises that consideration is also given to the required overall step change in modal shift towards active/sustainable travel for all journeys, particularly within</p>	<p>Add new indicator to Appendix 3 (1<sup>st</sup> set of Monitoring Indicators) so that consideration is also given to the required overall step change in modal shift towards active/sustainable travel for all journeys, particularly within and related to the Garden Town Communities.</p>	<p>No change required to the LPSV  ECC agrees to withdraw this representation.</p>

Representation Ref.	Policy	Objection on soundness 1- Positively prepared; 2 -Justified; 3- Effective; 4 - Consistent with National Policy	ECC proposed modifications	Agreed position
		and related to the Garden Town Communities. See Policy SP 4 C (xii).		
67	Appendix 3 (3 <sup>rd</sup> set of Monitoring Indicators)	3 - Effectiveness Add further Monitoring Indicator: This will address the planned step change in modal shift/share demonstrating delivery of Policy SP 4 C (xii).	Add further Monitoring Indicator: This indicator needs to address the planned step change in modal shift/share demonstrating delivery of Policy SP 4 C (xii).	No change required to the LPSV ECC agrees to withdraw this representation.