

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.
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.	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:  ECC agrees to withdraw this representation subject to the following:  Proposed LPSV modification: Paragraph 6.23  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 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	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	ECC agrees to withdraw this representation subject to the following:  Proposed LPSV modification: Policy P 1, part K, point (iii)

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		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.	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.	(iii) a new primary school and early years childcare provision ( <u>including land provision of a minimum of 2.1 hectares</u> ); <del>which could be accommodated through the relocation of Ivy Chimneys Primary School</del> );
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)  (i) Expansion of <u>primary and secondary schools</u> 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 schools</u> 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 schools</u> ;  <b>ECC position:</b> ECC supports this proposed change and it meets this representation

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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 14D (page 175)	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)]  (iv) <u>Expansion of primary and secondary schools</u>  Policy P 11 part D [new point (iv)]  (iii) <u>Expansion of primary and secondary schools</u>  Policy P 12 part E [new point (iv)]  (iii) <u>Expansion of primary and secondary schools</u>  Policy P 13 part F [new point (iii)]  (iii) <u>Expansion of primary and secondary schools</u>  Policy P 14 part D [new point (iii)]  (iii) <u>Expansion of primary and secondary schools</u>
59	Policy P 6F (North Weald Bassett) and Policy P 10D + Map 5.12	3 Effectiveness This does not list the need for contributions to increase the number of secondary school places to serve this area The need for a new primary school is correctly listed but the policy fails to	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. Map 5.12 needs to either show a suitable school	ECC agrees to withdraw this representation subject to the following:  Proposed LPSV modification: Policy P 6 part F point (i)

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		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). 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.	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.	(i) A new primary school <u>and early years childcare provision (including land provision of a minimum of 2.1 hectare), as well as contributions towards additional secondary school places;</u>
60	Policy P 7C (Chigwell)	3 Effectiveness 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.	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).	ECC agrees to withdraw this representation subject to the following:  Proposed LPSV modification: Policy P 7 part C point (i)  (i) <u>Secondary school expansion; Expansion of primary and secondary schools</u>

### 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).	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.  ECC agrees to withdraw this representation subject to the following:  Proposed LPSV modification: Paragraph 4.118

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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 Part C of policy is not clearly in line 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:

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		<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 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: <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 climate change, and include at least one source control SuDS measure, resulting in a net</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 demonstrate 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>



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			<p>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. In a related vein, ECC (Public Health) recommends that 'healthy living' is</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

		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 from 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 encouraged to minimise journey lengths for employment ...’ (paragraph	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 attractive; and encourage ease of movement <u>by active/sustainable modes</u> .

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		37). Suggest that 'encourage ease of movement' be amended to 'encourage ease of movement <i>by active/sustainable modes</i> '.		
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 ensure that the policy wording is as clear and positive as possible in the	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;

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		interests of delivering the best possible prospects of success in achieving this objective.		
20	Policy SP 4 C (xiii)	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.	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.	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;
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 ' <i>left turn slip road</i> ' 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 ' <i>suitable accesses will need to be agreed with the highway authority</i> '.	ECC agrees to withdraw this objection subject to the following:  Proposed LPSV modification: Policy SP 5 part H point (xii)  <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> <u>Suitable highway improvements to be agreed with the highway authority;</u>
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 ' <i>new and improved pedestrian/cycle links to key attractors</i> '.	ECC agrees to withdraw this representation subject to the following:  Proposed LPSV modification:  Policy P 1 part D new point after point (iii)

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>
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 ' <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 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 ' <i>new and improved pedestrian /cycle links to key attractors</i> '.	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 ' <i>new and improved pedestrian /cycle links to key attractors</i> '.	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 ' <i>new and improved pedestrian /cycle links to key attractors</i> '.	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 ' <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 5 part C, new point after point (i)  (X) <u>Improved pedestrian / cycle links;</u>
58	Policy P 6 (iii) (North	3 - Effectiveness ECC recommends that this also includes ' <i>and improvements to the</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:

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	Weald Bassett)	<i>local walk/cycle network to encourage and promote more sustainable travel.'</i>		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 ' <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 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 ' <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 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 ' <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 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 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	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, 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.	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.

Representation Ref.	Policy	Objection on soundness 1- Positively prepared; 2 -Justified; 3- Effective; 4 - Consistent with National Policy	ECC proposed modifications	Agreed position
		<p>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>		
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 and related to the Garden Town Communities. See Policy SP 4 C (xii).</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>
67	Appendix 3 (3 <sup>rd</sup> set of Monitoring Indicators)	<p>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).</p>	<p>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).</p>	<p>No change required to the LPSV  ECC agrees to withdraw this representation.</p>

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