

EFDC LPSV MMs ECC Assessment & Response – overall response comments table Main Mods (MMs)

Mod. No.	LPSV Policy / Page No.	Reason for Change / Source	Proposed Main Modification	ECC Response
MM8	Vision for the District Page 19	To recognise health and wellbeing principles in place shaping	Amend Vision for the District as follows: “By 2033 Epping Forest District will be a place where: (i) residents continue to enjoy a <u>healthy, happy and</u> good quality of life; () <u>air quality will be improved.</u> ”	Support Within the Vision for the district the importance of access is included in point ix but no reference is made to how GI can be used to connect places
MM9	Local Plan Objectives Page 20-21	Include reference in the Local Plan Objectives to the improvement of air quality and incorporation of green infrastructure and enhancement of biodiversity within the design of development. To recognise health and wellbeing principles in	Amend Objective A. ‘Environment and Design’ by amending points (iv), (v) and (vi) and the addition of new point after (vi) as follows: “(v) to ensure that the design, density, layout and landscaping of new development is sensitive to the surrounding area, is of a high quality, <u>incorporates green and blue infrastructure, protects and enhances biodiversity to deliver a net gain where appropriate</u> , and is designed so as to reduce opportunities for crime and anti-social behaviour; and “(vi) to ensure new development takes full account of, and mitigates <u>or improves</u> , where necessary <u>or appropriate</u> , potential problems from air pollution, land contamination and noise.; <u>and</u> ” “() <u>to ensure new development supports healthy living through its design and provides opportunities for physical activity and access to quality open space and employment opportunities.</u> ” Amend Objective E as follows:	Support Although health and well-being is mentioned - Objective A could also make direct reference to the importance of green infrastructure for health and well-being, as well as social equity

		place shaping (ED10B)	"E. <u>Air Quality</u> , Climate Change and Flood Risk	
MM14	Supporting text to Policy SP 2 Paragraph 2.66 Page 28-32	For clarification and to ensure consistency with Policy SP1 (formerly SP 2)	Amend Paragraph 2.66 as follows: 1. A sequential flood risk assessment – proposing land in Flood Zone 2 and 3 only where need cannot be met in Flood Zone 1;	Not Sound – effectiveness / consistency with NPPF 2021 (PARA.S 160 - 161) This section of the document is referring to the sequential test process but incorrectly only refers to the flood risk related to the EA flood zones and does not address wider risks associated with surface water flooding and flood risk from other sources. As LLFA, ECC recommends additional wording such as adding to the end of this text: <u>And avoiding land subject to other identified forms of flood risk</u>
MM15	Policy SP 2 Page 31-32	To clarify that Policy SP 2 is to be applied to windfall sites also.	Amend Part A of the Policy as follows: (ii) a sequential flood risk assessment – proposing land in Flood Zone 2 and 3 only where need cannot be met in Flood Zone 1;	Not Sound – effectiveness / consistency with NPPF 2021 (PARA.S 160 - 161) This section of the document is referring to the sequential test process but incorrectly only refers to the flood risk related to the EA flood zones and does not address wider risks associated with surface water flooding and flood risk from other sources. As LLFA, ECC recommends additional wording such as adding to the end of this text: <u>And avoiding land subject to other identified forms of flood risk</u>
MM16	Supporting text to Policy SP 3 (Note this runs before Policy SP 3 and after) Page 33-36	To better reflect Government policy in the NPPF with regards to health and wellbeing and to address	Amend paragraph 2.83 as follows: "2.83 [...] Development should ensure that new or changing places are: <ul style="list-style-type: none"> • functional <u>well</u>; • support mixed uses and tenures; • include successful public spaces; • are adaptable and resilient; 	Support

		<p>concerns raised by Essex County Council (ED10A)</p> <p>To recognise health and wellbeing principles in place shaping (Discussed during Hearing Session)</p>	<ul style="list-style-type: none"> • have a distinctive character; • are attractive; • and encourage ease of movement <u>by active and sustainable modes</u>.” <p>Insert new paragraphs after paragraph 2.88 to read as follows:</p> <p><u>“x.xx Public Health objectives focuses on health improvement and supporting communities to remain healthy. An Essex Health and Wellbeing Board and a local Health and Wellbeing Board has been established. Essex County Council, Epping Forest District Council and wider health and care providers strategies focus on the implementation of preventative measures to help reduce poor health across the County. Accordingly, most residential developments can promote healthy living through their design, thus contributing towards overarching public health priorities and helping to reduce some of the overall impacts of development.</u></p> <p><u>x.xx National planning policy and guidance defines a healthy community as a place that supports healthy behaviours and supports reductions in health inequalities. Planning policies and decisions should aim to achieve healthy, inclusive and safe places. Local authorities have a role in creating a healthy community and the Council will work closely with relevant stakeholders, developers and communities to ensure that future development in the District takes into account the need to improve the health and wellbeing of local residents (and workers) including access to appropriate health and care</u></p>	
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			<p><u>infrastructure.</u></p> <p>x.xx <u>For large development proposals, the extent of potential health impacts should be assessed through a Health Impact Assessment (HIA) to ensure that the development will help to encourage opportunities for healthy living and ensure access to appropriate healthcare services continues to be provided for the new development and community as a whole. The HIA should consider the positive and less positive impacts upon healthy living, as well as additional demands that are placed upon the capacity of health and care services arising from the development. The assessment must consider wider impacts on health and provide recommendations on how the development will impact upon these. HIAs should be prepared in accordance with local guidance and best practice, including guidance published by the Essex Planning Officers' Association. HIA should be prepared in line with the Council's Local List of Validation Requirements. Early advice on the type and scope of the HIA should be sought from the Council and additional advice may be provided by the Epping Forest District Health and Wellbeing Team.</u></p> <p>Additional Paragraph (reflecting ref to Active Design in SP2) after 2.91 as follows: "x.xxx <u>In order to promote sport and encourage active lifestyles, development proposals should incorporate the ten principles of Active Design developed by Sport England in partnership with Public Health England.</u></p>	
MM17	Policy SP 3	To recognise health and wellbeing principles shaping (Discussed during Hearing Session)	Amend lettering so that the Policy begins at Part	Support

	Page 34	<p>To address concerns raised by ECC (ED10A)</p> <p>To recognise health and wellbeing principles in place shaping</p> <p>To recognise health and wellbeing principles in place shaping</p> <p>To recognise health and wellbeing principles in place shaping</p>	<p>A. Amend Part H and include new point after point (xiv):</p> <p>“(iv) ensure a robust range of employment opportunities <u>are provided</u> with a variety of jobs within easy commuting distance of homes <u>by sustainable or active transport modes in preference to single occupancy car use</u>;</p> <p>(vi) ensure generous, well connected and biodiverse rich green and open space provision;</p> <p>(vii) extend, enhance and reinforce strategic green and blue infrastructure <u>assets</u> and the public realm <u>public open space</u>;</p> <p><u>“() incorporate the Active Design principles and supports healthy living through their design by providing opportunities for physical activity and sport, access to quality open spaces, and employment opportunities.”</u></p> <p>Insert a new Part after Part I as follows: <u>“. To ensure new developments have a positive impact on the health and well-being of residents, and address issues of health deprivation and health inequality in the District, the Council will require:</u></p> <p><u>(i) use Class C3 development in excess of 50 units and all Use Class C2 development and/or employment development in excess of 1,000 square metres floorspace to be accompanied by a HIA prepared in accordance with local guidance.</u></p>	
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		Discussed during Hearing Session)	<u>Where detrimental impact to health and wellbeing is identified, planning permission will be refused unless the impact identified can be mitigated through the design, infrastructure provision and/or funding to meet the health requirements, or by other measures; and</u> <u>(ii) where appropriate new development will be expected to contribute towards the provision of built facilities and other improvements to healthcare services.”</u>	
MM18	Supporting text to Policy SP 4 Page 40-41	To further clarify the Council’s position in addition to Policy SP 4, Part C (ix) To reflect the Inspector’s Interim findings (ED98)	Amendment to Paragraph 2.107 as follows: <u>“x.xxx The growth plans for the Garden Town require the implementation of a new junction (Junction 7A) on the M11. This new junction is planned to be operational by 2023, prior to the occupation of the Garden Communities. In order to maximise the promotion of use of sustainable transport measures, it will be necessary for key elements of sustainable transport provision to be available when Garden Communities are first occupied. This will be required in order to prevent the establishment of unsustainable travel behaviour, and to provide viable alternatives to private car use. The Council will secure the necessary measures through the use of planning obligations or other relevant mechanisms as appropriate.”</u> Insert new paragraph following paragraph 2.118: <u>“x.xxx To provide this coordinated approach, Harlow Council, East Herts District Council, Epping Forest District Council, Hertfordshire County Council and Essex Country Council commissioned a Harlow and Gilston Garden Town Infrastructure Delivery Plan (HGGT IDP) (published</u>	Support (with additional point to add, as set out below)

		To further clarify the Council's position in addition to Policy SP 4, Part C (ix) (ED10B)	<u>in April 2019) to set out the infrastructure required to deliver the planned level of housing and employment growth for the Garden Town. The HGGT IDP drew on previous work undertaken by the Councils, in particular, the District-level IDPs produced to support the respective local plans. The HGGT IDP also identifies how expected developer contributions from the Garden Communities are expected to be apportioned to the different Garden Communities, and what collection mechanisms can be utilised by the Councils to assist in funding the infrastructure items which serve more than one Garden Community. IDPs are 'live documents' updated regularly to ensure they reflect current infrastructure requirements. Updates made at the District-level will be cognisant of the Garden Town and vice versa."</u>	Insert the words ' and costs ' after 'to ensure they reflect current infrastructure requirements' to describe the IDP process more fully
MM19	Policy SP 4	<p>To provide clarification and to ensure consistency In response to concerns raised by ECC (ED10A)</p> <p>To recognise health and wellbeing principles in place shaping (ED10A)</p>	<p>Amend Part C(vii) as follows:</p> <p>"(xii) Ensure the provision of integrated and sustainable transport systems for the Harlow and Gilston area Garden Town that put walking, cycling and public transport networks and connections at the heart of growth in the area, to create a step change in modal shift through providing for, and encouraging and actively promoting more sustainable travel patterns;"</p> <p>"(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, and reduces single occupancy car use in order to improve air quality, and reduce</p>	Support

		<p>To further clarify the Council's position in addition to Policy SP 4, Part C (ix) (ED10B)</p>	<p>emissions and promote healthy lifestyles. Development Garden Town Communities must ensure the provision of <u>provide</u> high quality, safe and direct walking and cycling routes and linkages to and from Harlow within a permeable site layout with <u>which give</u> priority over vehicular traffic;”</p> <p>New point after (xviii) <u>“() Ensure key transport interventions (such as M11 Junction 7a and provision of sustainable transport (providing viable alternatives to the private car) are provided as prerequisites of development being occupied. Measures to ensure future upkeep/ maintenance of sustainable transport provision will be required.”</u></p>	
MM20	Supporting text to Policy SP 5	<p>To reflect the Inspector's Interim findings (ED98) To address concerns raised by ECC (HW7)</p> <p>To reflect the Inspector's Interim findings (ED98) To address concerns</p>	<p>Amend Paragraphs 2.125-2.129 (including moving paragraph 2.127 to end of paragraph 2.125) as follows: “Latton Priory “2.125 Sites within <u>The Latton Priory allocation</u> provides capacity for a <u>minimum of around</u> 1,050 homes, alongside community facilities, including early years <u>provision facilities</u>, a new two form entry primary school (including provision of land) and appropriate contributions towards a secondary school (including the provision of land) to serve the needs arising from new development. <u>In addition 0.5 ha for up to five traveller pitches will be provided.</u>”</p> <p>Water Lane “2.128 Sites within <u>The Water Lane Area allocation</u> provides capacity for a <u>minimum of around</u> 2,100 homes, alongside community facilities, including early years <u>provision facilities</u>, a new two form entry primary school (including provision of land) and appropriate</p>	Support

		<p>raised by ECC (HW7)</p> <p>To reflect the Inspector's Interim findings (ED98) To address concerns raised by ECC (HW7)</p>	<p>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>East of Harlow "2.129 The East of Harlow allocation is located across the administrative boundaries between of Harlow District Council and Epping Forest District Councils. The land within the Epping Forest District provides capacity for a <u>minimum of 750 homes</u>. Development is required to provide community facilities including early years <u>provision facilities</u>, a two-form entry new primary school (<u>including provision of land</u>) and appropriate contributions (including the provision of land) towards a new secondary school (<u>including 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>	
MM20	Supporting text to Policy SP 5 Page 42	To address concerns raised by Thames Water and EA (ED3)	<p>Amend Paragraph 2.130 as follows: 2.130 The development of the site also provides the opportunity to resolve flood risk issues, both onsite and off-site, downstream and upstream. <u>The masterplan and design of the site should be informed by the recommendations of the latest Strategic Flood Risk Assessment report to address flood risk.</u>"</p>	<p>Not Sound – effectiveness / consistency with NPPF 2021 (PARA.S 160 - 161) In addition to the SFRA weight should be given to Surface Water Management Plan (SWMPs) Action plans for the area, as these are more recent than the SFRA As LLFA ECC recommends adding wording as follows: <u>The masterplan and design of the site should be informed by the recommendations of the latest Strategic Flood Risk Assessment report and Surface Water Management Plan (SWMPs) Action plans for the area to address flood risk.</u></p>
MM21	Policy SP 5 and revised Map 2.2	To include Sustainable Transport	<p>New map after Map 2.1 and new section after Part E as follows: ". <u>Land will be safeguarded for the Sustainable</u></p>	<p>ECC supports inclusion of new map overall The following is provided to ensure soundness in relation to this strategic allocation in relation</p>

	Latton Priory SM Area	Corridor routes within the Plan (Matter 8 Hearing Statement)	<p><u>Transport Corridors in accordance with Map x.x and the Policies Map. Development proposals and Strategic Masterplans will be required to safeguard land accordingly.</u></p>	<p>to being effective and justified</p> <p>The PJA Latton Priory Access Study developed a concept for the site and access arrangements. This was the accepted access strategy by all HGGT partners. It included:</p> <ul style="list-style-type: none"> • STC access to the north parallel to Fern Hill Road - this is not shown on the EFDC plan and should be included in a similar way that Harlow DC included in its sound and adopted (December 2020) Local Plan for the new Eastern Stort Crossing pointing to East Herts DC area. The STC connection could be made slightly further east in the Harlow Green wedge – the PJA plan is a concept. • Vehicle access to the East to London Road (but could be used by STC services to Epping) • Vehicle access to the west – Rye Hill Road but with changes to the junction and measures to reduce rat running down Rye Hill Road to London Road. <p>This part of the Plan MMs requires additional information, detail and some revisions accordingly by adding the above points: The STC route northwards would best be shown indicatively in vicinity of Fern Hill Road (rather than specifically following all of Fern Hill Road)</p> <p>Also the new Rye Hill Road link should also mention need to contribute to wider transport measures in Southern Harlow</p>
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MM20	Policy SP 5	<p>To provide flexibility and address concerns raised by ECC (ED10A)</p> <p>As above</p> <p>In response to highways recommendations from ECC (ED10B)</p> <p>To reflect IDP and to ensure greater consistency across Plan</p> <p>To provide flexibility and address concerns raised by ECC (ED10A)</p> <p>In response to concerns raised by ECC (ED10A)</p> <p>In response</p>	<p>Latton Priors</p> <p>Amend Part F (v) as follows: “(viii) A two-form entry new primary school with Early Years and Childcare provision on an education site of at least 2.1 hectares”</p> <p>Amend Part G Water Lane Area as follows: New point after (iv): “(v) A two-form entry new primary school with early years and childcare provision on an education site of at least 2.5 hectares.” “(ix) Highway and transport improvements including contributions towards sustainable transport corridors; works to Water Lane/A1169 roundabout; A1025/Abercrombie Way signals and traffic calming along the A1169 Southern Way Corridor;</p> <p>New point after (xi) as follows: “()The Council recognises that to facilitate a better position and alignment of the Sustainable Transport Corridor in the masterplan area that some limited residential development may be better located elsewhere in the masterplan area to deliver a comprehensively planned development.”</p> <p>Amend Part H East of Harlow as follows: “(vii) A two-form entry new primary school with Early Years and Childcare provision on an education site of at least 2.1 hectares,” “(xii) 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;”</p>	ECC supports these revisions to Policy SP 5
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		<p>to concerns raised by ECC (ED10A)</p> <p>“(xiv) <u>integration with</u> the proposed National Cycle Network Route 1; and</p> <p>New section after Part H:</p> <p><u>“. The East of Harlow strategic site allocation (SP 4.3) forms part of a wider Garden Community, the southern part of which has been allocated in the Harlow Local Development Plan (under Policy HGT 1). The Garden Community will be subject to the preparation of a single Strategic Masterplan. Through the preparation of the Strategic Masterplan, the extent of development across the masterplan area and the position of a build-to line will need to be agreed in order to appropriately safeguard the settlement edge of Sheering. If it is concluded through the preparation of the Strategic Masterplan that the proposed secondary school and/or community and health facilities are to be delivered within that part of the Garden Community in Harlow District, consideration will be given to the appropriate alternative mix and balance of land uses and the associated infrastructure that should be delivered within the strategic site allocation SP4.3. In determining the appropriate mix and balance of land uses, the Council will have regard to relevant policies within this Plan, in particular: Parts A. to F. of this policy; policies SP2 and SP3; the identified need for the types of development proposed within the wider Garden Community; and relevant environmental, heritage, transport, infrastructure and other planning opportunities and constraints.”</u></p> <p><i>Note that Part F. references above is Main Modification concerning Sustainable Transport</i></p>	
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			<i>Corridors with Latton Priory becoming Part G. This revised numbering will be implemented in final version of the Plan.</i>	
MM21	Policy SP 5	To provide further clarification and ensure consistency between policies (ED3)	<p>New point after (iv): <u>"() Except for essential infrastructure and water compatible developments, no built development will be permitted on land within Flood Zone 2 and 3 in the Council's latest Strategic Flood Risk Assessment, including the appropriate allowance for climate change."</u></p>	<p>Not Sound – effectiveness / consistency with NPPF 2021 (PARA.S 160 - 161) This section of the document is referring to the sequential test process but incorrectly only refers to the flood risk related to the EA flood zones and does not address wider risks associated with surface water flooding and flood risk from other sources. As LLFA, ECC recommends additional wording such as adding to the end of this text: <u>And avoiding land subject to other identified forms of flood risk</u></p>
MM25	Policy SP 7 Page 52-53	Reference key documents	<p>Key evidence here should include reference to the Emerging Environment Bill, 25 Year Environment Plan, Essex Green Infrastructure Strategy and emerging national and Essex Green Infrastructure Standards. Could also make reference to NPPF in relation to GI. For example:</p> <p>Para 20. Strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for: d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.</p> <p>Para 34. Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure</p>	Support

			<p>(such as that needed for education, health, transport, flood and water management, green and digital infrastructure).</p> <p>Para 154. New development should be planned for in ways that:</p> <p>a) avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure</p> <p>Para 175. Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.</p>	
MM40	Supporting text to Policy T 1 Page 72-73	To signpost applicants to the Local List of Validation Requirements	<p>New bullet point under Paragraph 3.88:</p> <p>• <u>“ensuring that all planning applications for developments which are likely to generate significant amounts of vehicle movements, as defined in the Council’s Local List of Validation Requirements, will be required to submit a Transport Assessment or Transport Statement and normally be supported by a Travel Plan.”</u></p>	Support
MM41	Policy T 1 Page 74-75		A (ii) - Green Infrastructure can be used to promote healthy active lifestyles by creating green cycle and walking routes and improving the accessibility people	Support

			have to these spaces	
MM42	Policy T 2	<p>To better describe Harlow and Gilston Garden Town Sustainable Transport Corridors</p> <p>(Discussed during Hearing Session)</p>	<p>Amend Paragraph 3.95 as follows:</p> <p>“3.95 [...] In addition, land may <u>will</u> also be needed for improvements to rail train, bus, cycling and walking networks, to improve connectivity and/or capacity. <u>This includes in relation to the provision of the Sustainable Transport Corridors to be delivered as part of the development of the Harlow and Gilston Garden Town.</u> It is important the Council ensures that such schemes are not prevented from being provided <u>delivered</u> as a result of permitting development on land required for their implementation.”</p> <p>Addition to end of Paragraph 3.96 as follows:</p> <p>“3.96 [...] <u>Notwithstanding the move towards electric vehicles such sites will continue to be needed including, in some cases, to provide electric vehicle charging opportunities.</u>”</p>	Support
MM43	<p>Policy T 2</p> <p>Pg 76</p>	<p>To make specific reference to the requirement to safeguard land to deliver the transport improvements which are of strategic importance to the delivery of the Plan.</p>	<p>New part before Part A and amend Part A as follows:</p> <p>“<u>. Land will be safeguarded for the delivery of the Sustainable Transport Corridors as part of the development of the Harlow and Gilston Garden Town. Development proposals and Strategic Masterplans will be required to safeguard land accordingly.</u>”</p> <p>“A. Land required for proposed transport schemes <u>or accessibility improvements</u> as identified <u>in the Local Plan, or in</u> Plans and Programmes including Essex County Council’s Highways and Transport Investment Programmes, the Highways England</p>	Support

		<p>To ensure that land required to facilitate the delivery of other schemes and projects will be protected where locations are known. (Discussed during Hearing Session)</p>	<p>Route Investment Strategies, Network Rail Investment Strategies and Transport for London Investment Strategies will be protected from other developments which would prevent their proper implementation.”</p>	
MM46	Supporting text to Policy DM 2	<p>In support of its response to MM46 ECC provides the following context and justification:</p> <ul style="list-style-type: none"> ○ ECC wishes to support EFDC in its longstanding efforts to put in place an up-to-date (NPPF compliant) Local Plan ○ Similarly, ECC welcomes and supports the broad approach of EFDC in seeking to develop and implement a range of responses, acting across a number of different fronts, to prevent unacceptable impacts that are harmful to the integrity of Epping forest SAC ○ However, within the Council’s adopted INTERIM Air Pollution Mitigation Strategy (APMS) these rely on introducing a CAZ as a central, key measure, albeit qualified by “should future monitoring demonstrate it is required”. On the basis of the current position (as set out in APMS para.s 5.22 – 5.44 and Appendices 2 & 3) and our understanding of the available evidence to date, ECC does not support the proposal to introduce a CAZ for Epping Forest and the planned introduction date of 2025 ○ Engagement and Consensus: This needs to be a key feature of joint work going forwards. As a key partner with the statutory role as highways / transport authority, ECC needs to be engaged fully on the question of introducing a CAZ as a solution, alongside EFDC Natural England and the forest conservators in considering this proposal. In this context, formal ECC Member / Cabinet approval would be required for agreement for ECC to be party to establishing a CAZ. On this, ECC advises that ECC Councillors and officers will continue to engage under the Duty to Co-operate on this issue ○ Feasibility: ECC is aware that a deliverable, feasible and costed CAZ proposal that meets all necessary 		

		<p>objectives has not been developed and shared. In this way it has not been demonstrated that a CAZ would provide a feasible solution to the impacts it is intended to resolve</p> <ul style="list-style-type: none"> ○ The stated introduction date of 2025 (APMS Appendix 3): From the exploratory work carried out to date, ECC considers that this date would prove unachievable to put a CAZ system in place and to do so would likely require a timeframe closer to 2030, given important constraints such as the legal and regulatory processes to work through (but even with a 2030 date, the bullet point above still applies) ○ In this respect it appears to ECC that given the lead in time required to develop and implement a CAZ (years, rather than months), work on this would need to start at around the time the Local Plan is likely to be adopted (early 2022) to meet the 2025 deadline date. ECC notes that there is a tension within the stated EFDC position (as outlined in the APMS and reflected in the Local Plan MMs) in that a CAZ would only be introduced “should future monitoring demonstrate it is required”, with a preference not to do so. Further work, modelling and analysis is necessary to demonstrate that a CAZ is essential and this is where ECC can assist in ensuring sound modelling is undertaking and every alternative looked at. This would therefore need to run in parallel with taking the steps necessary to introduce a CAZ (such as feasibility work; consultation; internal EFDC / other approvals; the preparation of Traffic Regulation Orders; a potential inquiry etc.). Government guidance (para.s 115-117) also clearly recommends giving advance notice before a CAZ is made operational to affected individuals, businesses etc. before such a zone is introduced. ECC and other key partners would need to be involved closely in the evidence and review process to establish an eventual imperative that a CAZ system is collectively deemed essential ○ Costs are also considered likely to be very substantial: the indicative costs (of £2.46mn) stated in the APMS (APMS Appendix 4) are noted but as a basic, high level comparison, the UK’s first CAZ introduced outside of London (Bath) cost a stated £23mn to implement. ECC considers that further and more in-depth consideration is required on the realistic means of funding a potential CAZ and investigating the alternative measures to avoid the need for a CAZ. Also, experience from CAZ schemes introduced and operational so far is limited (London and Bath). These tend to be confined to (generally larger) city locations and there are no identifiable examples of using a CAZ elsewhere in a comparable context to that for Epping Forest, a predominantly rural area ○ Unintended consequences and potential harmful impacts: have not yet been identified through the interim APMS. ECC has identified the likelihood of these, particularly through traffic diverting from forest roads onto alternative nearby routes, including those within and connecting urban areas. As lead Public Health authority for Essex, ECC has a statutory role and duty in the protection of human health. ECC is not assured that introducing a CAZ within this context and location could be achieved without unacceptable impacts on human health. In this way, the measures proposed to solve one particular problem are likely to create a different problem of similar magnitude. These are also likely to include conflicts with the levelling up / equalities agenda, in that road charging regimes, such as CAZ are likely to impact the less affluent within society disproportionately , meaning that an Equalities Impact Assessment would also be required
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		<ul style="list-style-type: none"> ○ Overall approach and full package of measures to address harmful impacts on the forest SAC need to be sustainable. This includes the protection of human health and taking the wider determinants of health into account ○ In a related vein, the agreed approach also needs to reflect the agreed commitments (of both ECC and EFDC) to tackle climate change more broadly ○ Thus it is recommended that introducing a CAZ needs to be treated as a measure of last resort and this would be subject to evidential demonstration to ECC as Public Health authority, through rigorous Health Impact Assessment, that unacceptable impacts on human health would not arise ○ As a consequence of the above, the identification of appropriate alternatives and concerted action across multiple fronts, involving a range of key partners to develop a shared solution, is the necessary approach. ECC will play a full and active part, as an equal partner, in the seeking of feasible and viable alternatives to a CAZ. ECC for example, was instrumental in delivering the first full electric charging vehicle forecourt at Braintree (GRIDSERVE) in 2019 ○ ECC recommends that a fresh approach is developed to build consensus based on effective collaboration and agreed, shared outcomes ○ ECC considers that a key element of the holistic approach required is introducing an up-to-date sustainable transport and access strategy for Epping Forest district, that links fully to surrounding areas. ECC is very supportive of this approach and considers that it would provide the currently absent overall strategic framework within which all other measures need to be co-ordinated ○ Finally, ECC is confident that viable alternatives to a CAZ for this context are available and that joint work with EFDC, Natural England and the forest conservators are the key to refining the final package of measures that meet all required objectives without reliance on a CAZ ● With the above points in mind relating to the CAZ and the APMS and having regard to an ECC position that supports the adoption of the EFDC Local Plan, ECC recommends that the following MMs references to CAZ are amended to further qualify its intention and delivery. It is the further modelling, monitoring and investigation of all alternative actions (where ECC will need to be involved) that will provide the evidence to clearly demonstrate whether a CAZ is feasible and deliverable 		
MM46	Supporting text to Policy DM 2	To reflect the Inspector's Interim findings (ED98)	<p>Cites APMS + CAZ (CAZ required as part of conclusions of HRA 2021)</p> <p>New Paragraphs following Paragraph 4.23: <u>"x.xx In relation to air pollution the Council has adopted an Air Pollution Mitigation Strategy (APMS) which sets out the actual measures that</u> </p>	<p>Given the above context and justification, in relation to LP MM text as it relates in particular to the EFDC Interim APMS December 2020 (ED126 / EB212) ECC recommends that this part of MM46 is revised as follows</p> <p>New Paragraphs following Paragraph 4.23:</p>

		<p><u>the Council will implement during the lifetime of the Plan. These measures range from those which will help to limit the increase in the level of traffic using roads through the Epping Forest SAC and significantly increase the uptake of electric vehicles, through to the implementation of a 'Clean Air Zone' should the future monitoring demonstrate that it is required [INSERT FOOTNOTE 1 AS BELOW]. The APMS also includes targets against which progress will be assessed together with a Monitoring Framework, which includes for future on-site monitoring. This Monitoring Framework is necessary to ensure that progress towards the achievement of these targets is assessed and inform any necessary changes that may need to be made to the targets and measures and identified in the APMS or the Local Plan in terms of the quantum and location of development being proposed.</u></p> <p>Footnote 1 to read: <u>" 1 The HRA 2021 concludes that a Clean Air Zone will be required, but it is possible that improvements in air quality may proceed more quickly than has been assumed in the modelling underlying the HRA and in that eventuality the need for a CAZ can be reviewed in response to air quality monitoring data."</u></p> <p>See also footnote to New Paragraphs following Paragraph 4.23</p>	<p><u>"x.xx In relation to air pollution the Council has adopted an INTERIM Air Pollution Mitigation Strategy (APMS) which sets out the actual measures that the Council will implement during the lifetime of the Plan. These measures range from those which will help to limit the increase in the level of traffic using roads through the Epping Forest SAC and significantly increase the uptake of electric vehicles, through to the implementation of a 'Clean Air Zone' should the future monitoring demonstrate that it is required and if this proves feasible and acceptable to the partner authorities involved (these being EFDC; ECC; Natural England; and the City of London Corporation – as the forest conservators). This would also be subject to demonstrating through Health Impact Assessment and EQIA that no unacceptable impacts on human health or equalities would arise [INSERT FOOTNOTE 1 AS BELOW]. The APMS also includes targets against which progress will be assessed together with a Monitoring Framework, which includes for future on-site monitoring. This Monitoring Framework is necessary to ensure that progress towards the achievement of these targets is assessed and inform any necessary changes that may need to be made to the targets and measures and identified in the APMS or the Local Plan in terms of the quantum and location of development being proposed. Thus, the APMS itself will be kept under regular review and updated as necessary to reflect the latest position on</u></p>
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				<p><u>targets and agreed measures”</u></p> <p>Footnote 1 to read: <u>“ 1 The HRA 2021 concludes that a Clean Air Zone will be required, but it is possible that improvements in air quality may proceed more quickly than has been assumed in the modelling underlying the HRA and in that eventuality the need for a CAZ can be reviewed in response to air quality monitoring data.”</u></p> <p><i>In light of ECC’s comments about the proposed introduction date of 2025, ECC recommends and requests that all such dates referenced on a CAZ within the MMs are revised to refer to 2030 instead</i></p>
MM47	Policy DM 2 Page 82-83	<p>To reflect the Inspector’s Interim findings (ED98)</p> <p>To provide clarification (HW35)</p> <p>To provide clarification with respect to separating out the different components of mitigation.</p>	<p><u>Amend Parts A, B and C and remove Parts D and E as follows:</u></p> <p><u>B. New residential development that will have an adverse effect on integrity, likely to have a significant effect, either alone or in combination with other development in these areas plans or projects, will not be permitted unless sufficient will be required to demonstrate that adequate measures are secured and delivered to ensure there put in place to avoid or mitigate any potential adverse effects will be no harm to the integrity of the protected sites. For the Epping Forest SAC, the need for a strategic approach has been identified and such measures will therefore be expected to include those identified in the Mitigation Strategies adopted by the Council relating to air pollution and recreational pressure, which will be reviewed and updated as required</u></p>	<p>See response above (MM46)</p> <p>Also note the requirements to keep the APMS under regular review and updated wherever required as circumstances change</p>

		(HW35)	<p><u>where monitoring indicates this is necessary as required over the Plan period. For the avoidance of doubt, the relevant strategies for the Epping Forest, which have been adopted by the Council as a material consideration in the determination of planning and other relevant development related applications, are as follows:</u></p> <p><u>i) An Air Pollution Mitigation Strategy;</u> <u>ii) An Approach to managing Recreational Pressure on the Epping Forest Special Area of Conservation (SAMP Strategy); and</u> <u>iii) A Green Infrastructure Strategy.</u></p> <p><u>B1 – Epping Forest Air Pollution Mitigation Strategy – To mitigate for potential or identified adverse effects on air quality arising from additional development in the District, all development giving rise to a net increase in average annual daily traffic, will be required to be mitigated in accordance with appropriate measures including those identified in the most up to date Air Pollution Mitigation Strategy adopted by the Council as a material consideration in the determination of planning and other relevant development related applications and proposals. Measures have been specifically identified in the Strategy to ensure no adverse effect on the integrity of the Epping Forest SAC. Development which is required to deliver measures on site or contribute to the delivery of off-site measures and the undertaking of monitoring will not be consented until such these measures, and any necessary financial contributions required for their delivery, are secured.</u></p>	
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MM47	Policy DM 2 Page 82-83		The current modifications state “Such provision and enhancements <u>should</u> be in accordance with the site-specific policies contained within this Plan and the most up to date adopted Green Infrastructure Strategy” – it is also suggested that the word <u>should</u> is updated to must to give more weight to the strategy.	Support
MM51	Policy DM 5 Page 86		This could be improved by making reference to the Essex GI Standards – there is no mention of multifunctionality here or the positive impact GI can have on health and well-being. Also the importance of good maintenance for continued functionality of these spaces.	Support
MM56	Policy DM 9 Pg 92-93	In response to concerns raised by ECC (ED10B) In response to concerns raised by Sport England (ED4) To recognise health and wellbeing principles in place shaping (Discussed during Hearing Session)	Amend Part A as follows: (iv) are planned, where appropriate , to minimise vulnerability to climate change impacts and which will not exacerbate vulnerability in other areas; and (v) incorporate design measures to <u>promote healthy communities and individuals</u> , reduce social exclusion, the risk of crime, and the fear of crime; and (vi) <u>enable/encourage healthy and active lifestyles..</u> Insert a new Part after I as follows: “ . <u>Where appropriate, the design of development proposals must integrate health and wellbeing principles and any relevant Health and Wellbeing strategies.</u> ”	ECC supports these text additions However, as with deletion of the qualifying words ‘Where appropriate’ considered unnecessary for criterion (iv) (in context of climate change) it is considered that the same should apply for the new text addition at new Part I. This is because incorporating health & wellbeing principles will generally be a relevant and necessary consideration within design and this text addition already states that only ‘relevant’ parts of Health & Wellbeing Strategies need be applied in that context
MM62	Supporting text to Policy DM	To provide clarification and to ensure	Amend Paragraph 4.99 as follows: “4.99 The Epping Forest District Council Strategic	

	15 Page 99	<p>consistency between policies (Matter 4 Hearing Statement)</p> <p>In response to concerns raised by ECC (ED10A)</p>	<p>Flood Risk Assessment (SFRA) Level 1 Update 2015 (SFRA 2015) and the Strategic Flood Risk Assessment – Site Assessment contains a great deal of detail on the matter of flood risk within the District [...].”</p> <p>Amend Paragraph 4.103 as follows:</p> <p>“4.103 National planning policy explains sets out that for the exceptions sequential test to be passed <u>development proposals need to demonstrate that: within the site the most vulnerable development within the site has been</u> is located in areas of <u>with the</u> lowest flood risk unless there are overriding reasons to prefer a different location. <u>For the Exception Test to be passed development proposals need to demonstrate that it is appropriately flood resistant and resilient, including safe access and escape routes where required; and that any residual risk can be safely managed, including by emergency planning; and it gives priority to sustainable drainage systems; and the development would provide wider sustainability benefits to the community that outweigh the flood risk.</u>”</p> <p>Amend Paragraph 4.106 as follows:</p> <p>“4.106 [...] <u>Development proposals should also take into account the Environment Agency Risk of Flooding from Surface Water Maps (RoFSW).</u>”</p>	ECC supports these changes (para.s 4.103 & 4.106)
MM63	Policy DM 15 Page 100-101	To provide clarification (Matter 16 Hearing Statement)	<p>Amend Part B and Part C as follows:</p> <p>“B. <u>Development proposals</u> The Local Plan allocations are directed towards Flood Zone 1 or to areas with the lowest probability of flooding. Any proposals for new development (except water compatible uses) <u>which include land which</u></p>	ECC supports these changes overall

			<p><u>falls wholly or partially</u> within Flood Zones 2 and/or 3a <u>and other areas affected by other sources of flooding</u> will be required to provide sufficient evidence for the Council to assess whether the requirements of the Sequential Test and <u>if necessary, the</u> Exception Test, have been satisfied. <u>The Sequential Test does not need to be applied to sites which have been allocated in this Local Plan and where the proposed development is in accordance with this Plan.</u></p> <p><u>“C. Where required by national planning policy and guidance development</u> Pproposals 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:”</p> <p>Addition of new part after Part G as follows: <u>“ . Site specific Flood Risk Assessment must be undertaken in accordance with relevant national and local requirements. Revised hydraulic modelling including climate change allowances will be required as part of a site-specific Flood Risk Assessment where this is deemed necessary by the Council. ”</u></p>	
MM64	Supporting text to Policy DM 16 Page 102	In response to concerns raised by ECC. (Matter 16 Hearing Statement)	4.118 [...] Attention should be paid to the most up to date Technical Guidance from <u>the Council</u> , Government, British Water, and the Environment Agency and Essex County Council. <u>Sources of detailed design guidance include Essex County Council’s SuDS Design Guide and the CIRIA SuDS Manual.</u> ”	Support
MM65	Policy DM 16 Page 102	To provide clarification (Discussed	Amend Part A and D and remove Part B as follows: “A. All proposals for new development must seek to manage surface water as close to its source as	Not Sound – not effective It is not clear from the documentation what the proposed discharge Hierarchy is. ECC

		during Hearing Session/ Matter 15 Hearing Statement) To avoid duplication of Building Regulations	possible <u>using the most appropriate SuDS solution, or combination of solutions, taking into account site specific circumstances and the Council's preferred</u> in line with the following drainage hierarchy <u>in the following order:</u> [...]" "B. Other methods must also reflect the stringent drainage hierarchy contained within the current CIRIA SuDS Manual (2015), which provides further detailed guidance over and above Building Regulations: (i) controlled discharge of rainwater direct to a watercourse/surface water body; (ii) controlled discharge rainwater to a surface water sewer/drain; (iii) controlled discharge rainwater to the combined sewer." "D. The Council will require Sustainable Drainage Systems (SuDS) to be sensitively incorporated into new development by way of site layout and design, having regard to the following requirements:	updated our requirements in 2020 to push rainwater reuse to the top of priority list. See: ECC advice: The Sustainable Drainage Systems Design Guide – Discharge Locations Where possible this should be reflected in local plans across the county. Change required: identify clear Discharge Hierarchy as recommended above
MM65	Policy DM 16 Page 102	To differentiate more clearly between the policy requirements for greenfield and brownfield developments and between major and minor developments	New point before (i): () <u>All major development proposals will be required to submit a Drainage Strategy to identify the most appropriate drainage solutions.</u> (i) all major <u>greenfield</u> 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 <u>sustainable drainage systems</u> measure resulting in a net improvement in water quantity and quality discharging <u>from the site</u> to a sewer <u>and/or a watercourse;</u>	Support

			<p>Note existing Point (ii) repositioned after existing Point (iii) as below</p> <p>(iii) all ‘minor’ and ‘other’ non-major-greenfield development proposals should aim to achieve the 1 in 1 greenfield run off rate where possible, including an allowance for climate change, or a rate as otherwise agreed with the Council; and</p> <p>(ii) all major and non-major brownfield development proposals <u>which involve a quantum of new-build</u> should aim to achieve the 1 in 1 greenfield run-off rate and, at a minimum, achieve a <u>50% per-cent</u> reduction in existing site run-off rates for all events, including an allowance for climate change, <u>and include SuDS sustainable drainage systems</u> measures resulting in a net improvement in water quantity and quality discharging <u>from the site</u> to a sewer and/or a watercourse;</p> <p>(iv) for all development where the <u>1 in 1</u> greenfield run-off rate cannot be achieved, justification must be provided to demonstrate that the run-off rate has been reduced as much as possible.”</p>	
MM69	DM 19 Page 106		Water Butts	<p>Support</p> <p>Paragraph 4.139 states that The Council expects all new non-residential development to secure a reduction in water usage. This is positive but it should also add that all residential developments should consider water re-use and as a minimum should include a requirement for water butts with new properties.</p>
MM77	Supporting text to Policy P 1 Page 115-	To reflect modifications to site allocations including in	<p>Amend section under Paragraph 5.12 as follows:</p> <p>“5.12 Policy SP1211 sets out the number of homes to be provided in Epping over the Plan period. The provision of approximately 4,305 709 dwellings homes has been informed by the aspiration for Epping to support an</p>	<p><i>NB – this is not a comment indicating the MM is unsound</i></p> <p>ECC supports this reduction in scale of homes growth for Epping in principle, in the interests of protecting the integrity of EF SAC</p>

	116	<p>response to Action 19 relating to EPP.R1 and R2.</p> <p>To reflect modifications to site allocations including in response to Action 19 relating to EPP.R1 and R2.</p> <p>To ensure the need for private car use is minimised as a result of development and that appropriate mitigation measures are provided (Matter 15 Hearing Statement)</p>	<p>appropriate level of growth to continue in its role as one of the main towns within the District.</p> <p>Amend Paragraph 5.14 as follows: “5.14 Following an assessment of the suitability, availability and achievability of residential sites located within these spatial options, the Council has identified 44-9 sites for allocation to meet the identified housing requirement, as set out in <u>this pPolicy P 4.</u>”</p> <p>New paragraph after Paragraph 5.23: <u>“Sustainable Transport Choices</u></p> <p><u>x.xx A key consideration for development proposals in Epping, 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.”</u></p>	<p>However, addressing road traffic congestion in areas nearby (such as Ivy Chimneys junction) remains a requirement for this proposed growth, measures for which it needs to be able to enable. These considerations mean that achieving high levels of sustainable travel for the S Epping masterplan growth remains essential</p>
MM78	<p>Policy P 1</p> <p>Pg 116 – 118</p>	<p>Mods to site allocation (S Epping) in response to Inspector’s</p>	<p>Amend Policy P 1 Part B as follows: “(i) EPP.R1 Land South of Epping, West and Approximately 450 homes EPP.R2 Land South of Epping, East – Approximately 500 <u>450</u> homes and <u>appropriate uses</u></p>	<p>Support – reduction in scale of South Epping Masterplan Area sites (in the interests of minimising harmful impacts on Epping Forest SAC)</p>

	<p>+ Map 5.1 (Site Allocations in Epping)</p>	<p>action 19</p> <p>To address concerns raised by ECC (Matter 15 Hearing Statement). To address concerns raised by ECC (ED10A)</p> <p>To clarify the infrastructure requirements for Policy P 1. (Matter 15 Hearing</p>	<p>“(ii) EPP.R3 Epping London Underground Car Park – Approximately 89 homes “(iv) EPP.R5 Epping Sports Centre – Approximately 432 homes” “(ix) EPP.R10 Land to rear of High Street – Approximately 6 homes”</p> <p>Amend Part K as follows:</p> <p>(i) a minimum of 950 approximately 450 homes; (iii) a new primary school and early years childcare provision (which could be accommodated through the relocation of Ivy Chimneys Primary School); (v) new road access and internal road layout to support a bus corridor; <u>Provision or enhancement of walking and cycling facilities, Public Rights of Way and linkages both within the site, over the railway line, the footbridge over the M25, and to key destinations including Epping London Underground Station and the Town Centre;</u> (vi) a new vehicular, pedestrian and cycling bridge over the railway line; <u>Vehicular access/egress which provides safe access to the local highway network, does not impact on its safe and efficient operation, does not result in the loss of important boundary trees and/or hedgerows, or cause material harm to the living conditions of adjoining residents as a result of noise, light pollution or privacy.</u> (vii) car clubs/car sharing or pooling arrangements, visitor parking and blue badge holders;</p> <p>Remainder of D to become new Part after D and specified elements amended as follows: “. Specifically, Development proposals in Epping will be expected to deliver and/or contribute</p>	<p>Policy P 1 Part B would be improved and effectiveness / justification ensured if the numerous allocated town centre residential sites were to be approached in a more co-ordinated way and brought forward holistically under a single Masterplan that identifies and addresses cumulative impacts. This includes seven sites located in close proximity: R4; R5; R6; R7; R8; R10; R11</p> <p>Not Sound – effectiveness / justification ECC still requires (and had agreed with EFDC) that for Epping a new primary school is</p>
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	<p>Statement, IDP Update and exercise to ensure greater consistency across Plan in how infrastructure items referred)</p> <p>Required in response to revisions as a result of Action 19. To address concerns raised by ECC (Matter 15 Hearing Statement). To address concerns raised by ECC (ED10A)</p> <p>To provide clarification (Discussed during Hearing Session)</p>	<p>proportionately towards the following infrastructure items <u>as required, including:</u></p> <p>(ii) new primary school <u>education provision including early years, primary school and secondary school places;</u></p> <p>(iii) appropriate provision of health facilities; <u>() provision of walking and cycling facilities and linkages both within the site and to key destinations;</u></p> <p><u>() enhancements to public transport provision or other initiatives which reduce the need to travel by car;</u></p> <p>(iv) highways and junction upgrades;</p> <p>Amend Part K as follows: “K. In addition to the requirements set out above, the Strategic Masterplan should <u>must</u> make provision for: (i) a minimum of 950 <u>approximately</u> 450 homes; (ii) a new neighbourhood centre to include <u>appropriate</u> community <u>and health</u> facilities, employment and retail uses; (iii) a new primary school and early years childcare provision (which could be accommodated through the relocation of Ivy Chimneys Primary School);..... (v) new road access and internal road layout to support a bus corridor; <u>Provision or enhancement of walking and cycling facilities, Public Rights of Way and linkages both within the site, over the railway line, the footbridge over the M25, and to key destinations including Epping London Underground Station and the Town Centre;</u> (vi) a new vehicular, pedestrian and cycling bridge over the railway line; <u>Vehicular access/egress which provides safe access to the local highway network, does not impact on its safe and efficient</u></p>	<p>needed. Revise Part D (ii) to reinstate wording including new primary school (it is noted that this requirement has not been delated from Part K (iii))</p> <p>ECC supports these text additions to promote sustainable travel</p> <p>ECC supports these changes overall in principle but in part K (iii) reference to need for EYCC (together with the new primary school) has been deleted, possibly in error and was not agreed Change required: reinstate reference to need for EYCC provision within criterion K (iii)</p>
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		<p>To ensure the need for private car use in minimised as a result of development (Matter 15 Hearing Statement)</p> <p>To reflect Action 19</p>	<p><u>operation, does not result in the loss of important boundary trees and/or hedgerows, or cause material harm to the living conditions of adjoining residents as a result of noise, light pollution or privacy.</u></p> <p>(vii) car clubs/car sharing or pooling arrangements, visitor parking and blue badge holders;.....</p> <p>New Parts after Part L as follows: “ . <u>The Strategic Masterplan must incorporate measures to promote and encourage the use of sustainable methods of transportation and provide viable alternatives to single occupancy private car use including car clubs/car sharing or pooling arrangements. Such measures are to be planned in consultation with Essex County Council (and relevant passenger transport providers). The proposed measures should be underpinned by feasibility evidence that comprehensively demonstrates the delivery of modal shift by way of sustainable travel measures.</u>”</p> <p><u>“ . Any application for planning permission made subsequent to the endorsed Strategic Masterplan should be accompanied by an assessment of potential air quality impacts demonstrating compliance with J. above, Policy DM2 and Policy DM22 and the Council’s adopted Air Pollution Mitigation Strategy. Such an assessment must take into account the results of monitoring in 2024/2025 which is to be undertaken in accordance with the Council’s adopted Air Pollution Mitigation Strategy. Accordingly no application for permission should be determined prior to such monitoring results being available.”</u></p>	
MM78	Policy P 1	To provide	Replace Part I as follows:	Not Sound – effectiveness / consistency with

	Pg 116 – 118	clarification and provide consistency between policies. (Matter 4 Hearing Statement)	<p>“I. In accordance with Policy DM 15, development on residential allocations must be located wholly within Flood Zone 1. <u>Except for essential infrastructure and water compatible developments, no built development on residential allocations will be permitted on land within Flood Zones 2 and 3 as shown on the Council's latest Strategic Flood Risk Assessment maps, including the appropriate allowance for climate change.</u>”</p>	<p>NPPF 2021 (PARA.S 160 - 161)</p> <p>This section of the document is referring to the sequential test process but incorrectly only refers to the flood risk related to the EA flood zones and does not address wider risks associated with surface water flooding and flood risk from other sources.</p> <p>As LLFA, ECC recommends additional wording such as adding to the end of this text: <u>And avoiding land subject to other identified forms of flood risk</u></p>
MM80	Policy P 2 Loughton	<p>To reflect modifications to site allocations in response to Action 17</p> <p>Amend to (i) to address concerns raised by ECC (ED10A)</p>	<p>Amend sub parts of Part B as follows:</p> <p>(i) LOU.R1 Loughton London Underground car park – Approximately 165 homes</p> <p>(ii) LOU.R2 Debden London Underground car park – Approximately 192 homes.....</p> <p>(v) LOU.R5 Land at Jessel Green – Approximately 154 homes</p> <p>(viii) LOU.R8 Land West of High Road – Approximately 29 homes.....</p> <p>(xiv) LOU.R14 Land at Alderton Hill - Approximately 33 19 homes”</p> <p>(xvii) LOU.R17 Land to the rear of High Road – Approximately 12 homes</p> <p>Remainder of E to become new Part after E and specified elements amended as follows:</p> <p>(i) expansion of secondary schools in the local area <u>education provision including early years, primary school and secondary school places;</u></p> <p>New point after Point (iii) as follows:</p> <p><u>“() provision of walking and cycling facilities, and linkages both within the site and to key destinations;”</u></p>	<p>ECC supports these policy changes and in particular the (deletion of allocated residential sites and) reduction in scale of proposed homes growth from 1,021 homes to 455 homes – in the interests of protecting the integrity of EF SAC</p> <p>Support</p> <p>ECC supports these text additions</p>

			<p><u>“() enhancements to public transport provision or other initiatives which reduce the need to travel by car;”</u></p>	
MM82	<p>Policy P 3 Waltham Abbey</p> <p>Pg 128-130</p>	<p>To clarify the infrastructure requirements for Policy P 3 (Matter 15 Hearing Statement IDP Update and exercise to ensure greater consistency across Plan in how infrastructure items referred)</p> <p>To reflect the Inspector's Interim findings (ED98).</p>	<p>Remainder of F to become new Part after F and specified elements amended as follows:</p> <p>. Specifically, Development proposals in Waltham Abbey will be expected to <u>deliver and/or</u> contribute proportionately towards the following infrastructure items <u>as required, including:</u></p> <p>“(i) Expansion of two primary schools within Waltham Abbey Forecast Planning Group; education provision including early years, primary school and secondary school places;”</p> <p>New Points after (ii) as follows:</p> <p><u>“() provision of walking and cycling facilities, providing linkages both within the site and to key destinations, including to the Lee Valley Regional Park; “</u></p> <p><u>“() enhancements to public transport provision or other initiatives which reduce the need to travel by car;”</u></p> <p><u>“() appropriate provision of surface water drainage measures;”</u></p> <p>Remove Part G as follows: “G. The Council will seek the potential relocation and expansion of a secondary school in the local area in order to meet future needs arising from development.”</p> <p>Amend Part N as follows: (v) Expansion of a Secondary School in the local area”</p> <p>Amend Part P as follows: “P. In accordance with Part F the Masterplan should</p>	<p>ECC restates that it required the following in this regard, which was agreed by EFDC (see SoCG - ED10A): ‘ECC agrees to withdraw this representation subject to the following: Proposed LPSV modification: Policy P 3 part F point (i) (i) Expansion of two primary <u>and secondary</u> schools within <u>the</u> Waltham Abbey Forecast Planning Group;’</p> <p><i>Support</i></p> <p><i>Support</i></p> <p>Object – not effective / justified Expansion of secondary school provision to support local growth is still required but has been deleted in error. Change required – reinstate reference to need for expansion of local secondary school to meet future needs arising from development</p>

			explore and support the possible relocation and expansion of the King Harold Secondary School to an appropriate site within this Masterplan Area.”	Support
MM82	Policy P 3 Waltham Abbey Pg 128-130	To provide clarification and provide consistency between policies (Matter 4 Hearing Statement)	Amend Part L as follows: “L. In accordance with Policy DM15, development on residential allocations must be located wholly within Flood Zone 1. <u>Except for essential infrastructure and water compatible developments, no built development on residential allocations will be permitted on land within Flood Zones 2 and 3 as shown on the Council's latest Strategic Flood Risk Assessment maps, including the appropriate allowance for climate change.</u> ”	Not Sound – effectiveness / consistency with NPPF 2021 (PARA.S 160 - 161) This section of the document is referring to the sequential test process but incorrectly only refers to the flood risk related to the EA flood zones and does not address wider risks associated with surface water flooding and flood risk from other sources. As LLFA, ECC recommends additional wording such as adding to the end of this text: <u>And avoiding land subject to other identified forms of flood risk</u>
MM84	Policy P 4 Ongar Pg 134 - 135		Remainder of D to become new Part after D and specified elements amended as follows: “(i) Expansion of one of the primary schools appropriate contributions to increase the number of primary and secondary school places <u>education provision including early years, primary school and secondary school places;</u> “ New Parts after (i) as follows <u>“() provision of health facilities;</u> <u>“() provision of walking and cycling facilities and linkages both within the site and to key destinations;</u> <u>“() enhancements to public transport provision or other initiatives which reduce the need to travel by car;</u>	Support
MM84	Policy P 4 Ongar Pg 134 - 135	To provide clarification and provide consistency	Replace Part H as follows: “H. In accordance with Policy DM15, development on residential allocations must be located wholly within Flood Zone 1. <u>Except for essential infrastructure</u>	Not Sound – effectiveness / consistency with NPPF 2021 (PARA.S 160 - 161) This section of the document is referring to the sequential test process but incorrectly only

		between policies (Matter 4 Hearing Statement)	<u>and water compatible developments, no built development on residential allocations will be permitted on land within Flood Zones 2 and 3 as shown on the Council's latest Strategic Flood Risk Assessment maps, including the appropriate allowance for climate change."</u>	refers to the flood risk related to the EA flood zones and does not address wider risks associated with surface water flooding and flood risk from other sources. As LLFA, ECC recommends additional wording such as adding to the end of this text: <u>And avoiding land subject to other identified forms of flood risk</u>
MM85	Policy P 5 Buckhurst Hill	To provide clarification and provide consistency between policies (Matter 4 Hearing Statement)	Replace Part H as follows: "H. In accordance with Policy DM15, development on residential allocations must be located wholly within Flood Zone 1. <u>Except for essential infrastructure and water compatible developments, no built development on residential allocations will be permitted on land within Flood Zones 2 and 3 as shown on the Council's latest Strategic Flood Risk Assessment maps, including the appropriate allowance for climate change."</u>	Not Sound – effectiveness / consistency with NPPF 2021 (PARA.S 160 - 161) This section of the document is referring to the sequential test process but incorrectly only refers to the flood risk related to the EA flood zones and does not address wider risks associated with surface water flooding and flood risk from other sources. As LLFA, ECC recommends additional wording such as adding to the end of this text: <u>And avoiding land subject to other identified forms of flood risk</u>
MM85	Policy P 5 Buckhurst Hill	To clarify the infrastructure requirements for Policy P 5 (ED10A)	Remainder of C to become new Part after C and specified elements amended as follows: New Parts after (i) as follows: <u>() appropriate education provision including early years, primary school and secondary school places</u> <u>() appropriate provision of health facilities</u> <u>() provision of walking and cycling facilities, and linkages both within the site and to key destinations;</u> <u>() enhancements to public transport provision or other initiatives which reduce the need to travel by car; and"</u>	Support
MM86	Policy P 6 North	To ensure the need for	New subheading and paragraph after Paragraph 5.99 as follows:	Support

	Weald – supporting text	private car use in minimised as a result of development and that appropriate mitigation measures are provided. (Matter 15 Hearing Statement)	<p><u>“Sustainable Transport Choices</u></p> <p><u>x.xx 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 in North Weald Bassett to benefit from new opportunities without having to use their cars. In doing so it is recognised that sustainable access to Epping London Underground Station will continue to be needed and that 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 be considered together to develop co-ordinated sustainable transport proposals.”</u></p>	
MM87	Policy P 6 North Weald	To ensure the need for private car use in minimised as a result of	<p>New Part after Part E as follows:</p> <p><u>“Sustainable Transport Choices</u></p> <p><u>. In accordance with Policy T1, all development proposals must demonstrate how they will</u></p>	Support

		development and that appropriate mitigation measures are provided (Matter 15 Hearing Statement)	<u>respond to the need to make provision for, and improve and promote use of 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. 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 measures should provide for, and encourage, more sustainable travel patterns by contributing toward integrated walking and cycling, and public transport connectivity to the wider areas, including Epping and Harlow. 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.”</u>	
MM87	Policy P 6 North Weald	To clarify the infrastructure requirements for Policy P 6 (Matter 15 Hearing Statement / HW28)	<p>Remainder of F to become new Part after F and specified elements amended as follows: “(i) a new primary school; <u>appropriate education provision including early years, primary school and secondary school places;</u>” <i>NB The same modification (deletion) applies at Part L (iv)</i></p> <p>New Parts after (i) as follows: <u>“() the provision of walking and cycling facilities, providing linkages both within the site and to key destinations;”</u> <u>() enhancements to public transport provision or other initiatives which reduce the need to travel by</u></p>	<p>Object – effectiveness / not justified Deletion of specific references to need for new primary school was (and still is) identified as necessary to support local growth of this scale. The reference is now too unclear for purposes of developers / applicants etc.</p> <p>Change required: reinstate wording of deleted criterion F (i) and L (iv)</p> <p>Support new parts to policy after (i)</p>

			<u>car;”</u>	
MM89	Policy P 7 Chigwell	To provide clarification and provide consistency between policies (Matter 4 Hearing Statement)	Replace Part F as follows: “H. In accordance with Policy DM15, development on residential allocations must be located wholly within Flood Zone 1. <u>Except for essential infrastructure and water compatible developments, no built development on residential allocations will be permitted on land within Flood Zones 2 and 3 as shown on the Council's latest Strategic Flood Risk Assessment maps, including the appropriate allowance for climate change.</u> ”	Not Sound – effectiveness / consistency with NPPF 2021 (PARA.S 160 - 161) This section of the document is referring to the sequential test process but incorrectly only refers to the flood risk related to the EA flood zones and does not address wider risks associated with surface water flooding and flood risk from other sources. As LLFA, ECC recommends additional wording such as adding to the end of this text: <u>And avoiding land subject to other identified forms of flood risk</u>
MM90	Policy P 8 Theydon Bois	To clarify the infrastructure requirements for Policy P 8 (Matter 15 Hearing Statement/ED 10A)	Remainder of C to become new Part after C and specified elements amended as follows: New Parts after (iii) as follows: <u>“() appropriate education provision including early years, primary school and secondary school places; and</u> <u>“() provision of walking and cycling facilities, and linkages both within the site and to key destinations;”</u> <u>“() enhancements to public transport provision or other initiatives which reduce the need to travel by car; and “</u> <u>“() appropriate provision of health facilities.”</u>	Support
MM90	Policy P 8 Theydon Bois	To provide clarification and provide consistency between policies (Matter 4 Hearing Statement)	Replace Part G as follows: “H. In accordance with Policy DM15, development on residential allocations must be located wholly within Flood Zone 1. <u>Except for essential infrastructure and water compatible developments, no built development on residential allocations will be permitted on land within Flood Zones 2 and 3 as shown on the Council's latest Strategic Flood Risk Assessment maps, including the appropriate</u>	Not Sound – effectiveness / consistency with NPPF 2021 (PARA.S 160 - 161) This section of the document is referring to the sequential test process but incorrectly only refers to the flood risk related to the EA flood zones and does not address wider risks associated with surface water flooding and flood risk from other sources. As LLFA, ECC recommends additional wording such as

			<u>allowance for climate change.”</u>	adding to the end of this text: <u>And avoiding land subject to other identified forms of flood risk</u>
MM92	Policy P 9 Roydon	To clarify the infrastructure requirements for Policy P 9 (Matter 15 Hearing Statement/ED 10A)	Remainder of C to become new Part after Part C and specified elements amended as follows: <u>“() appropriate education provision including early years, primary school and secondary school places;”</u> <u>“() appropriate provision of health facilities;”</u> <u>“() the provision of walking and cycling facilities, providing linkages both within the site and to key destinations, including to the Lee Valley Regional park;”</u> <u>“() enhancements to public transport provision or other initiatives which reduce the need to travel by car; and</u>	Support
MM92	Policy P 9 Roydon	To provide clarification and provide consistency between policies (Matter 4 Hearing Statement)	Replace Part E as follows: “H. In accordance with Policy DM15, development on residential allocations must be located wholly within Flood Zone 1. <u>Except for essential infrastructure and water compatible developments, no built development on residential allocations will be permitted on land within Flood Zones 2 and 3 as shown on the Council's latest Strategic Flood Risk Assessment maps, including the appropriate allowance for climate change.”</u>	Not Sound – effectiveness / consistency with NPPF 2021 (PARA.S 160 - 161) This section of the document is referring to the sequential test process but incorrectly only refers to the flood risk related to the EA flood zones and does not address wider risks associated with surface water flooding and flood risk from other sources. As LLFA, ECC recommends additional wording such as adding to the end of this text: <u>And avoiding land subject to other identified forms of flood risk</u>
MM94	Policy P 10 Naxeing	To clarify the infrastructure requirements for Policy P 10 (Matter 15 Hearing Statement/ED	Amend Part D - New Part after (i) as follows: <u>() appropriate provision of health facilities;</u> New Parts after (ii) as follows: <u>() provision of walking and cycling facilities, and linkages both within the site and to key destinations, including to the Lee Valley Regional Park;</u>	Support

		10A)	<u>() enhancements to public transport provision or other initiatives which reduce the need to travel by car;</u>	
MM94	Policy P 10 Nazeing	To provide clarification and provide consistency between policies (Matter 4 Hearing Statement)	Replace Part G as follows: “H. In accordance with Policy DM15, development on residential allocations must be located wholly within Flood Zone 1. <u>Except for essential infrastructure and water compatible developments, no built development on residential allocations will be permitted on land within Flood Zones 2 and 3 as shown on the Council's latest Strategic Flood Risk Assessment maps, including the appropriate allowance for climate change.</u> ”	Not Sound – effectiveness / consistency with NPPF 2021 (PARA.S 160 - 161) This section of the document is referring to the sequential test process but incorrectly only refers to the flood risk related to the EA flood zones and does not address wider risks associated with surface water flooding and flood risk from other sources. As LLFA, ECC recommends additional wording such as adding to the end of this text: <u>And avoiding land subject to other identified forms of flood risk</u>
MM96	Policy P 11 Thornwood	To clarify the infrastructure requirements for Policy P 11 (ED60)	New Parts after D (i) as follows: <u>“() appropriate education provision including early years, primary school and secondary school places;”</u> <u>() appropriate provision of health facilities.”</u> <u>“() Enhancements to public transport provision or other initiatives which reduce the need to travel by car;”</u>	Support
MM96	Policy P 11 Thornwood	To provide clarification and provide consistency between policies (Matter 4 Hearing Statement)	Replace Part H as follows: “H. In accordance with Policy DM15, development on residential allocations must be located wholly within Flood Zone 1. <u>Except for essential infrastructure and water compatible developments, no built development on residential allocations will be permitted on land within Flood Zones 2 and 3 as shown on the Council's latest Strategic Flood Risk Assessment maps, including the appropriate allowance for climate change.</u> ”	Not Sound – effectiveness / consistency with NPPF 2021 (PARA.S 160 - 161) This section of the document is referring to the sequential test process but incorrectly only refers to the flood risk related to the EA flood zones and does not address wider risks associated with surface water flooding and flood risk from other sources. As LLFA, ECC recommends additional wording such as adding to the end of this text: <u>And avoiding land subject to other identified forms of flood risk</u>

MM98	Policy P 12 Coopersale (& other villages)	To clarify the infrastructure requirements for Policy P 12 (Discussed during Hearing Session)	Amend Part E - New points before (i) as follows: <u>() appropriate education provision including early years, primary school places and secondary school places;</u> <u>() appropriate provision of health facilities;</u> <u>() enhancements to public transport provision or other initiatives which reduce the need to travel by car;</u>	Support
MM98	Policy P 12 Coopersale (& other villages)	To provide clarification and provide consistency between policies (Matter 4 Hearing Statement)	Replace Part H as follows: "H. In accordance with Policy DM15, development on residential allocations must be located wholly within Flood Zone 1. <u>Except for essential infrastructure and water compatible developments, no built development on residential allocations will be permitted on land within Flood Zones 2 and 3 as shown on the Council's latest Strategic Flood Risk Assessment maps, including the appropriate allowance for climate change.</u> "	Not Sound – effectiveness / consistency with NPPF 2021 (PARA.S 160 - 161) This section of the document is referring to the sequential test process but incorrectly only refers to the flood risk related to the EA flood zones and does not address wider risks associated with surface water flooding and flood risk from other sources. As LLFA, ECC recommends additional wording such as adding to the end of this text: <u>And avoiding land subject to other identified forms of flood risk</u>
MM 100	Policy P 13 Rural Sites in the east of the district	To clarify the infrastructure requirements for Policy P 13 (Discussed during Hearing Session)	Amend Part F - specified elements amended as follows: <u>"() appropriate education provision including early years, primary school and secondary school places;"</u> <u>() appropriate provision of health facilities; and</u> <u>() enhancements to public transport provision or other initiatives which reduce the need to travel by car."</u>	Support
MM 100	Policy P 13 Rural Sites in the east of the district	To provide clarification and provide consistency between	Replace Part I as follows: "H. In accordance with Policy DM15, development on residential allocations must be located wholly within Flood Zone 1. <u>Except for essential infrastructure and water compatible developments, no built</u>	Not Sound – effectiveness / consistency with NPPF 2021 (PARA.S 160 - 161) This section of the document is referring to the sequential test process but incorrectly only refers to the flood risk related to the EA flood

		policies (Matter 4 Hearing Statement)	<u>development on residential allocations will be permitted on land within Flood Zones 2 and 3 as shown on the Council's latest Strategic Flood Risk Assessment maps, including the appropriate allowance for climate change."</u>	zones and does not address wider risks associated with surface water flooding and flood risk from other sources. As LLFA, ECC recommends additional wording such as adding to the end of this text: <u>And avoiding land subject to other identified forms of flood risk</u>
MM 102	Policy P 14 Rural Sites in the west of the district	To clarify the infrastructure requirements for Policy P 14 (Discussed during Hearing Session)	Amend Part D - to create new Part after D as follows: <u>"() appropriate education provision including early years, primary school and secondary school places;"</u> <u>() appropriate provision of health facilities; and</u> <u>() enhancements to public transport provision or other initiatives which reduce the need to travel by car."</u>	Support
MM 102	Policy P 14 Rural Sites in the west of the district	To provide clarification and provide consistency between policies (Matter 4 Hearing Statement)	Replace Part F as follows: "H. In accordance with Policy DM15, development on residential allocations must be located wholly within Flood Zone 1. <u>Except for essential infrastructure and water compatible developments, no built</u> <u>development on residential allocations will be permitted on land within Flood Zones 2 and 3 as shown on the Council's latest Strategic Flood Risk Assessment maps, including the appropriate allowance for climate change."</u>	Not Sound – effectiveness / consistency with NPPF 2021 (PARA.S 160 - 161) This section of the document is referring to the sequential test process but incorrectly only refers to the flood risk related to the EA flood zones and does not address wider risks associated with surface water flooding and flood risk from other sources. As LLFA, ECC recommends additional wording such as adding to the end of this text: <u>And avoiding land subject to other identified forms of flood risk</u>
MM 106	Policy D 1 Page 183-184	To provide further clarification in relation to the Council's approach to the	Amend Part A as follows (note: struck through text moved to new Part to Policy below as outlined): "A. New development must be served and supported by appropriate on and offsite infrastructure and services as identified through the Infrastructure Delivery Plan <u>Schedules</u> . Proposals must demonstrate that there is sufficient appropriate	Support

		<p>consideration of viability matters at the development management stage (ED72)</p> <p>To provide further clarification in relation to the Council's approach to the consideration of viability matters at the development management stage (ED72)</p> <p>To provide clarification</p> <p>In response to concerns raised by ECC (ED10A)</p>	<p>infrastructure capacity to support the development or that such capacity will be delivered by the proposed development. Applications must be able to demonstrate that such capacity will prove to be sufficient and sustainable over time both in physical and financial terms.</p> <p>[New Part following A]:</p> <p><u>. Development proposals must will be expected to deliver and/or contribute proportionately towards the delivery of those infrastructure items set out in the Infrastructure Delivery Plan Schedules as required, unless subsequent iterations of the Infrastructure Delivery Plan Schedules or discussions with providers determine that these requirements have changed. Planning Obligations will only be sought where they meet the relevant tests set out in CIL Regulations or as amended.]</u></p> <p>New part to be included at the end of the Policy as follows:</p> <p><u>“ . Developers and landowners 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>	
MM 107	<p>Supporting text to Policy D 2</p> <p>Page 185-186</p>	<p>In response to concerns raised by ECC (Matter 13 Hearing Statement)</p>	<p>Amend Paragraph 6.23 as follows:</p> <p>“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</u></p>	Support

			<u>ensure good accessibility to schools through the provision of safe, direct routes by sustainable/ and active modes of transport. The creation of a safe and attractive environment around schools will also be required.”</u>	
MM 108	Policy D 2 Pg 186	To provide clarification (Discussed during Hearing Session)	Additional criterion to Part B as follows: “(iv) <u>A suitable replacement service or facility of an equivalent or higher standard is provided on site or in an appropriate alternative location which is accessible to local residents affected by the loss.”</u>	Support
MM 112	Policy D 8 Page N/A – not in Local Plan Submission Version	To establish a clear, consistent an agreed basis for future review, consistent with paragraph 33 of the NPPF 2019 (ED71) To reflect the Inspector's Interim findings (ED98)	Addition of new Policy D8 Local Plan Review and supporting text following Policy D7: “Local Plan Review <u>6.55 Local Plans need to be reviewed regularly to assess how well policies and proposals are being implemented and to ensure that they are up-to-date. Monitoring, together with the consideration of wider changes, provides the objective basis necessary for such reviews.</u> <u>Approach</u> <u>6.56 In accordance with national planning policy and relevant Regulations, the Council will review policies within this Plan to assess whether or not they need updating at least every five years. The first review will be completed no later than five years from the adoption date of the Local Plan.</u> <u>6.57 On completion of the review the Council will publish its conclusions, clearly indicating which policies (if any) need to be updated, and the reasons for this decision. If one or more policies do need updating, the Council will simultaneously publish an updated Local Development Scheme</u>	Support

		<p><u>setting out the timetable for the updates to be produced and submitted for Independent Examination.</u></p> <p><u>6.58 When reviewing the policies within the Plan the Council will take into account the latest monitoring reflected within the latest Authority Monitoring Report, in addition to a range of other local and national factors.</u></p> <p><u>6.59 This Policy also includes a number of instances where, should relevant circumstances arise, the Council will undertake an earlier review and, if necessary, update relevant Local Plan policies accordingly.”</u></p> <p><u>“Policy D8 Local Plan Review</u></p> <p><u>A. The Council will complete a review of the Local Plan policies and publish its conclusions at least every five years. Conclusions from the first review will be published no later than five years from the adoption date of the Plan.</u></p> <p><u>B. The Council will have particular regard to the following factors when reviewing policies within the Local Plan and determining whether or not relevant policies require updating:</u></p> <ul style="list-style-type: none"> <u>• the latest Authority Monitoring Report, including reported progress against the requirements for the planned delivery of development and infrastructure;</u> <u>• conformity of policies with national planning policy;</u> <u>• changes to local circumstances (including a change in local housing need);</u> <u>• where, through monitoring, it is demonstrated that sustainable transport measures have not been</u> 	
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			<u>matters the Council will consult with Natural England and have regard to its advice.”</u>	
MM 180	THYB.R1 Page 147	To reflect the MM required to Policy DM 15 (In response to concerns raised by ECC (ED10A))	Amend section under ‘Flood Risk’ as follows: “The site has been identified as being at risk of surface water flooding. The design and layout of any development proposals should reduce the vulnerability and consequences of surface water flooding to the site and its surroundings. In order to achieve this, Development proposals should incorporate appropriate surface water drainage measures <u>having regard to the Environment Agency Risk of Flooding from Surface Water Maps (RoFSW)</u> in order to achieve this.”	Support
MM 181	THYB.R2 Page 149	To reflect the MM required to Policy DM 15 (In response to concerns raised by ECC (ED10A))	Amend section under ‘Flood Risk’ as follows: “[...] <u>Any development proposals should incorporate appropriate surface water drainage measures having regard to the Environment Agency Risk of Flooding from Surface Water Maps (RoFSW).</u> ”	Support
MM 191	South Nazeing Concept Framework Plan	To provide clarification and provide consistency between policies (ED61)	Amend section under ‘Flood Risk’ as follows: “ In accordance with Policy DM15, development on residential allocations must be located wholly within Flood Zone 1. <u>Except for essential infrastructure and water compatible developments, no built development on residential allocations will be permitted on land within Flood Zones 2 and 3 as shown on the Council’s latest Strategic Flood Risk Assessment maps, including the appropriate allowance for climate change.</u> ”	Not Sound – effectiveness / consistency with NPPF 2021 (PARA.S 160 - 161) This section of the document is referring to the sequential test process but incorrectly only refers to the flood risk related to the EA flood zones and does not address wider risks associated with surface water flooding and flood risk from other sources. As LLFA, ECC recommends additional wording such as adding to the end of this text: <u>And avoiding land subject to other identified forms of flood risk</u>
MM	LSHR.R1	To reflect the	Amend section under ‘Flood Risk’ as follows:	Support

198		MM required to Policy DM 15 (In response to concerns raised by ECC (ED10A))	“[...] In order to achieve this, dDevelopment proposals should incorporate appropriate surface water drainage measures <u>having regard to the Environment Agency Risk of Flooding from Surface Water Maps (RoFSW)</u> in order to achieve this.”	