

APPENDIX 1 ECC RESPONSE TO THE NEW CASTLE POINT LOCAL PLAN – PRE-SUBMISSION PLAN DECEMBER 2019

ECC Rep No's	Revised Publication Local Plan Reference Section, Paragraph, Policy or Map	Is the Revised Publication Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Revised Publication Plan sound / legally compliant	Appeal at EIP
1.	2.2 & 2.3	n/a	<p>4. Consistent with National Policy</p> <p>ECC welcome the clear recognition that the Essex Minerals Local Plan and Essex and Southend-on-Sea Waste Local Plan form part of the Development Plan in the administrative area of Castle Point.</p> <p>However, this is not fully reflected in paragraph 2.3 and ECC as Minerals and Waste Planning Authority seek an amendment to recognise that all the documents referred to in paragraph 2.3 'comprise the full suite of strategic policies, allocation policies and development management policies' rather than the emerging Local Plan in isolation.</p>	<p>Change Paragraph 2.3 to read:</p> <p><i>2.3 This document <u>The Development Plan</u> comprises the full suite of strategic policies, allocation policies and development management policies. The vision and objectives for future development and change within the Castle Point Borough <u>Local Plan</u> are accompanied by policies that set out the strategic approach to growth and distribution of development across the borough in order to achieve sustainable development.</i></p>	
2.	Paragraph 2.12	2Y	<p>4. Consistent with National Policy</p> <p>ECC considers that CPBC has met its obligations under Section 110 of the Localism Act 2011 regarding the duty to cooperate with regard to those statutory responsibilities of the County Council, namely Highways, Education, Minerals, Waste, Public Health, Lead Local Flood Authority and Adult Social Care.</p>	<p>None. However, ECC recommends that CPBC prepare a Statement of Common Ground to address ECC representations where an amendment or further evidence is sought.</p> <p>CPBC should continue to work collaboratively with ECC, before submission of the Draft Plan to address representations, to enable ECC to support CPBC at examination, and subsequent implementation of the Local Plan.</p>	

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			<p>CPBC has engaged ECC in all stages of local plan preparation to this consultation.</p> <p>ECC considers the statement in 2.12 and the subnational context in (3.11 – 3.32) to reflect the key activities undertaken by CPBC and ECC including engagement through ASELA, in respect of the Duty to Co-operate since the Regulation 18 Issues Consultation in July 2018. This includes regular meetings or joint work regarding:</p> <ul style="list-style-type: none"> • local and strategic matters, including detailed transport modelling and junction mitigation, A127 task force, joint highway funding Bids (OSE/ECC) and improvement schemes; • matters regarding ECC statutory responsibilities covering education, minerals and waste, public health, surface water management; Adult Social Care and waste management and disposal; • engagement with the preparation of the transport evidence base including Local Plan Traffic Modelling and Infrastructure Delivery Plan, it is recognised and agreed that further evidence is required and CPBC is engaging ECC on requirements. 		

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			<ul style="list-style-type: none"> Joint Member meetings to discuss strategic cross boundary matters with other local authorities in Essex joint working with ASELA “Memorandum of Understanding” on the core purpose and aims of ASELA and the principles of collaboration joint working through ASELA and the “Statement of Common Ground” to prepare a South Essex Joint Strategic Plan; joint working with ASELA to commission joint evidence base, and commence the preparation of a draft South Essex Plan, Issues consultation A127 SoCG (2017) signed by London Borough of Havering, ASELA partner authorities and Highways England and Transport for London. joint working through the A127 Task Force joint working with Essex Planning Officers’ Association on joint evidence base and protocols, including Essex Recreational Avoidance and Mitigation Strategy (RAMS); Essex Wide Gypsy and Traveller Accommodation Assessment (2018) and unmet need protocol (2019); Unmet Housing Needs Protocol (2017); Greater Essex 		

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			<p>Growth and Infrastructure Framework (2016); and Essex Design Guide (2018).</p> <p>In addition, ECC service area infrastructure requirements have been satisfactorily incorporated into specific Strategic Policies, site allocations and supporting text, subject to the amendments set out in ECC's representations.</p>		
3.	Strategic Priorities	n/a	<p>2. Justified 3. Effective.</p> <p>ECC note the strategic priorities as set out, to provide the overarching strategy for the Draft Plan.</p> <p>ECC support Bullet point 2 and would expect developer contributions to fund the new infrastructure in accordance with ECC Developers' Guide to Infrastructure Contributions 2016 (and successor documents).</p> <p>Change required to Bullet Point 8 for clarification to ensure the full range of sustainable modes of travel (passenger transport) and to obtain improvements to both infrastructure and service provision.</p>	<p>Change bullet point 8 to read:</p> <p><i><u>"Promote new active and sustainable modes of travel (including public transport) and reduce travel times by enhancing existing transport infrastructure, and facilities and services."</u></i></p> <p>Change the references to "Sustainable" Travel/Transport to read "<u>Active and Sustainable</u>" Travel/Transport" and that this is applied wherever they appear throughout the Draft Plan.</p>	

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			This is to accord with Local Plan policies TP1 – TP8; the Local Transport Plan and the following ECC guides and strategies (and successor documents)		
4.	Paragraph 3.9	n/a	<p>3.Effective</p> <p>Change paragraph for clarification. Insert a statement in the local plan regarding the presumption in favour of sustainable development in compliance with NPPF and to clarify that the Local Plan should be read as a whole, and the need to comply with all relevant policies of the Plan.</p> <p>This will remove the need to add a clause to the site allocation policies HO9 – HO32 regarding compliance with all relevant policies in the Plan</p>	<p>Change Paragraph 3.9 to clarify the need to comply with presumption in favour of sustainable development and the need for the policies within the plan to be read as a whole with other relevant policies of this Local Plan.</p> <p>Change to include following:</p> <ul style="list-style-type: none"> - Presumption in favour of sustainable development is central to all elements of the Local Plan - To Local Plan will positively seek opportunities to meet the development needs of Castle Point and meet objectively assessed development needs unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits. - Need to take local circumstances into account - All policies should be read in conjunction with other relevant policies of this Local Plan. 	
5.	Sub Nation Policy context The South Essex Local	n/a	<p>2.Justified</p> <p>Change required for clarification. To reflect the role and purpose of the new sub-national</p>	<p>Change paragraph 3.13 to read:</p> <p>1.13 The SELEP has an important role to play in allocating Government resources including</p>	

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	Enterprise Partnership Paragraphs 3.11-3.14		transport infrastructure arising from the Cities and Local Government Devolution Act (2016) and formation of the Transport East Board, to prioritise and agree transport investment priorities (as opposed to SELEP).	funding from the Department for Transport and the Growing Places Fund. It also provides a mechanism for coordination on strategic matters. A <i>Strategic Economic Plan</i> for the SELEP area identifies the funding priorities for the SELEP area and sets out a programme for delivering economic growth and change, therefore SELEP will be a key partner in helping the Council in the delivery of the plan. Insert a new section "Transport East Board" to explain the role and function of Transport East Board to deliver improved collective planning of transport infrastructure. CPBC to work with ECC to agree wording.	
6.	Paragraph 3.17 Integrated County Strategy	n/a	3.Effective 4.Consistent with National Policy Change required for clarification. Paragraph 3.17 as "Integrated County Strategy" is no longer a relevant or up to date ECC document, delete the reference to the strategy and move the paragraph to the start of the "county council policy context."	Delete the heading "County Strategy" and move paragraph 3.17, to be read below the heading "The County Policy Context" and before "Essex and Minerals and Local Plan", to provide the County context. Amend paragraph 3.17 to read, 3.17 <i>Castle Point Borough is a two-tier authority area, with Essex County Council (ECC) providing a range of services and infrastructure such as (but not limited to) highways and transportation, education, social services, and surface water management at a county-wide level. The County Council Strategy focuses the</i>	

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				<i>provision of services to achieve the greatest benefit to delivering a buoyant economy for both the existing and future residents and businesses in Essex. ECC Essex County Council has also published several <u>strategic policies and guidance documents in relation to ECC services and infrastructure provision and delivery, which are relevant to development and growth in the borough. These will be referenced throughout the Local Plan where relevant.</u></i>	
7.	Essex Local Transport Plan Paragraph 3.18	n/a	<p>2. Justified</p> <p>Change for clarification. The new ECC Sustainable Modes of Travel Strategy (SMOTs) was published in January 2019.</p> <p>Change to refer to the “published” strategy and remove the date of the document. It is recommended that this is applied to all ECC’s strategies and guides, to keep the references “up to date”, or include reference to successor documents</p> <p>Change for clarification. The SMOTs is not just about choice of travel, but about creating a sustainable framework to provide a viable alternative to private vehicles.</p>	<p>Change paragraph 3.18 to update reference to the “published” document and remove date. To read:</p> <p>3.18 <i>Essex County Council’s <u>published Sustainable Modes of Travel Strategy 2016</u> supports different modes of transport and seeks to create a sustainable framework to provide and aims</i> residents a real choice in the way in which they travel.</p> <p><u>Change</u> Add new text to provide cross boundary South Essex transport context including but not limited to:</p> <ul style="list-style-type: none"> - A127 Corridor for Growth: An Economic Plan (March 2014) and the A127 route management strategy. - The A127 Task Force. 	

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			<p>Change for clarification, insert a new text to provide the South Essex cross boundary transport context including but not limited to:</p> <ul style="list-style-type: none"> - Corridor for Growth: An Economic Plan (March 2014) and the A127 route management strategy. - Add reference to the A127 Task Force. - South Essex strategic road network - Highways England and Lower Thames Crossing - Network Rail 	<ul style="list-style-type: none"> - South Essex strategic route network including the A13 corridor, A130 and A127/A130 Fairglen Interchange - Highways England and Lower Thames Crossing Network Rail 	
8.	Strategic Policy for Greater Essex Paragraph 3.19	n/a	<p>2. Justified</p> <p>Change for clarification, as set out in response to the 2018 Regulation 18 consultation. In addition to the 2014 Economic Plan for Essex (2014), expand references to draw attention to the most up to date evidence and documents including:</p> <ul style="list-style-type: none"> • Essex Economic Commission Reports (2017) • Essex Employment and Skills Board Castle Point District-Profile 2017-2018; and • ECC's Essex "Grow on Space" study (2017) • Emerging South Essex Grow on Space 	<p>Change Paragraph 3.19 to draw attention to the most up to date evidence, including reference to:</p> <ul style="list-style-type: none"> • Essex Economic Commission Reports (2017) • Essex Employment and Skills Board Castle Point District-Profile 2017-2018; and • ECC's Essex "Grow on Space" study (2017) • Emerging South Essex Grow on Space 	

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9.	Strategic Policy for South Essex Paragraphs 3.20 - 3.25	n/a	2. Justified Change paragraph 3.20 to accurately reflect ECC's status as an equal partner authority within ASELA.	Change paragraph 3.20 to read: 3.20 <i>The South Essex local authorities, of Basildon, Brentwood, Castle Point, Rochford, Southend on Sea and Thurrock, and supported by Essex County Council formed the Association of South Essex Local Authorities (ASELA) in 2017.</i>	
10.	The South Essex Green Grid Strategy Paragraph 3.26	n/a	2. Justified ECC wish to draw attention to the emerging Green Essex Strategy, and its purpose and aims to create a county-wide understanding of green infrastructure. Further details are set out in response to Paragraphs 19.1-19.14.	Change paragraph 3.26 for context and to acknowledge the emerging Green Essex Strategy.	
11.	Canvey Island Paragraph 4.9	n/a	2. Justified The paragraph states: <i>'Canvey Island is peripheral to the public transport network',</i> ECC object to this statement which does not reflect the nature of the existing passenger transport services within on/off Canvey Island, which includes 20 buses per hour in each direction onto and off the island.	Change paragraph 4.9 to qualify the existing public transport network, with reference to frequency of services up to 20 buses per hour, in each direction onto and off the island	

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			<p>ECC seek changes to paragraph 4.9 to recognise and qualify the existing the public transport network. ECC welcome the references potential to improve the improve services, where opportunities exist, for example the later reference to a desire to improve evening and Sunday services</p> <p>ECC welcome the reference in paragraph 4.16 to recognise the significance that congestion plays in the reliability of public transport</p>		
12.	Key Drivers for Change Paragraph 5.11	n/a	<p>2. Justified 3. Effective</p> <p>Change required for clarification. The statement <i>"It is expected that there will be an increasing level of vacant school places,"</i> appears to contradict the need for a new school, as identified by ECC and proposed to be located in Policy HO9 (Land west of Benfleet).</p> <p>The statement should be changed to distinguish between the needs of the existing population and the needs of the potential population arising from the planned level of housing growth.</p>	Change Paragraph 5.11 to distinguish between the needs of the existing population and the needs of the potential population arising from the planned level of housing growth.	
13.	Objectives of the New Local Plan Paragraph 7.1	3N	3 Effective	Change objective 5 to read:	

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	Objective 5		<p>Change Objective 5 for clarification. To recognise the benefits of modal shift through the provision for and use of active and sustainable transport (including public transport) to improve the quality of life within communities; including, but not limited to:</p> <ul style="list-style-type: none"> - Increase in range of modal travel option - Improved sustainable transport network and services - Increased connectivity; and - Increased in transport capacity. <p>ECC recommend CPBC consider the preparation of a Local Walking and Cycling Infrastructure Plan with integrated passenger transport. (LCWIP+)</p>	<p>“To promote more <u>active and sustainable</u> travel patterns (including Public Transport) within Castle Point through the location of development, and the provision of <u>an integrated package of active, sustainable and passenger transport infrastructure and services, to improve connectivity, modal shift and network resilience; thereby increasing transport capacity</u> of public transport and cycling infrastructure to complement the existing highway network.</p>	
14.	Chapter 8 Achieving Sustainable Development Making Effective Use of Land Paragraph 8.8	n/a	<p>3. Effective</p> <p>ECC welcome the statement in paragraph 8.8, for CPBC to “<i>work with developers, land owners of sites and infrastructure providers to put in place master plans or planning or development briefs to ensure that all policy requirements are delivered from key sites, including optimising...</i>”</p>	None	
15.	Making Effective Use of Land	n/a	3.Effective	None.	

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	policy SD1		ECC welcome the policy SD1 “Making Effective Use of Land” and wish to be engaged, as relevant given the potential implications and opportunities for ECC as infrastructure and service provider.		
16.	Developer Contributions Paragraph 8.13	n/a	3.Effective ECC wish to be engaged by CPBC in the preparation of both the new Developer Contributions SPD and CIL in compliance with ECC’s Developers’ Guide to Infrastructure Contributions.	None. CPBC to engage ECC in the preparation of their new Developer Contributions SPD.	
17.	Paragraph 8.14	3Y	1.Positively Prepared ECC welcome the references to ECC’s “Developers’ Guide to Infrastructure Contributions”. Please note that a revised and updated document was prepared and consulted in 2019. Adoption is expected in 2020. ECC recommend that CPBC change references to the “published” ECC guide and remove the date.	Change all references to “ECC Developers’ Guide to Infrastructure Contributions 2016 to read: <i>“ECC Developers’ Guide to Infrastructure Contributions”</i>	

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18.	Paragraph 8.16	n/a	3. Effective The reference to CIL is noted, however clarification is required on the statement that CIL is being applied to ' <i>new development below the qualifying threshold</i> '. ECC seeks clarification on "Qualifying Threshold". Once CIL is introduced and applied (e.g. on an area basis) the threshold is one unit and above, hence there no qualifying threshold.	Change paragraph 8.16 to clarify the statement regarding " <i>qualifying threshold</i> ".	
19.	Policy SD2 Development Contributions	3Y	4. Consistent with national policy ECC welcome the policy SD2 seeking developer contributions for infrastructure, in accordance with National Policy. ECC welcome the policy which supports the ECC Developers' Guide to Infrastructure Contributions, where contributions will be sought for relevant applications.	None	
20.	Housing Strategy Policy HO1	3Y	1. Positively Prepared ECC welcome Policy HO1 providing the overall housing strategy, including provision to deliver at least the 5,284 new homes in the plan period; support for the Strategic Housing allocations; and for delivery of homes to be phased to align with infrastructure provision.	None	

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21.	Housing Need Paragraphs 9.4	n/a	3.Effective ECC note the reasoned justification for housing need in support of policy HO1, however recommend that the explanatory text provides the context for the provision for specialist accommodation for older people, and other vulnerable adults; to support policy HO1(2)(e).	Change Paragraph 9.4 to include references to the provision of specialist accommodation for older people and other vulnerable adults, in support of Policy HO1(2)(e). Suggest consideration to include references to the "ECC's Adult Social Care Market Position Statement", as referenced elsewhere in the Local Plan.	
22.	Paragraph 10.8	n/a	3.Effective ECC welcome and note the statements regarding land at North West Thundersley. ECC draw your attention to ECC's response to the 2018 Regulation 18 consultation Question 24, regarding this area. Namely. <i>ECC would not support any new development and employment allocations until the proposed long term transport scheme for the junction is implemented; hence the safeguarding of the site is only supported subject to the prior implementation of the long term highway improvement scheme for the A127/A130 Fairglens Interchange, for the reasons set out in ECC responses in 2016 and as set out in ECC's letter to Castle Point on 15th October 2015.</i>	None	

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23.	Strategic Housing Site Allocation Policies HO9 – HO32	3N	3.Effective Change for clarification. As set out in response to Paragraph 3.9, there is a need for a consistent site policy requirement to reference to the other relevant policies within the Local Plan. To ensure that: <ul style="list-style-type: none"> - the policies in the Local Plan are read in conjunction with the other relevant policies in the Local Plan, and - all the necessary infrastructure requirements and contributions are identified and delivered as set out in policy SD2 	Change all the strategic site allocations policies HO9-32 and EC2 to include a cross reference to the other relevant policies within the Local Plan	Y
24.	Strategic Housing Site Allocation Policies HO9 – HO32	3N	1. Positively Prepared ECC as Lead Local Flood Authority welcome the references to SUDS within the policies, however as presented the sites supporting text and policies only addresses SUDS in part, as a benefit of surface water flooding mitigation. This does not address the wider additional benefits of SUDS which should be incorporated within the site landscape strategies. SUDS determine the natural ways to prevent flooding by identifying areas to soak water	Change the supporting text and policies for the site allocations HO9 – HO32 to consistently reflect the full range SUDS requirements including surface water flood risk reduction onsite and offsite, improve water quality and quantity, promote landscape features with provision of green and blue infrastructure, biodiversity and amenity benefits. These should be explored within the landscape strategy for the sites. The above requirement is in addition to the existing policy SUDs criteria (such as HO9bvii) which does not address the wider additional benefits.	Y

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			<p>(infiltration), which manages rainfall close to where it falls. SUDS can be designed to follow a series of management practices, which helps to convey surface water at a slow rate using non-traditional drainage methods, provide source control structures (attenuation), minimize water pollution by onsite water pollution mitigation and hence reduce the impacts on the water quality of local water bodies, promote landscape features with provision of green and blue infrastructure, biodiversity and amenity benefits.</p> <p>ECC seek changes to the supporting text and policies for the site allocations HO9 – HO32 to refer to the additional benefits of using SUDS and refer to full range SUDS requirements to - provide source control measures to minimize the risk of surface water flooding, reduce runoff quantities using onsite storage, improve water quality and apply best approaches to manage surface water from new and existing developments. These measures promote landscape features, provide green and blue infrastructure, biodiversity and amenity value.</p> <p>ECC would expect future developments to make best use of above ground features to appropriately manage the surface water runoff,</p>	<p>Change Policies HO9 – HO32 SUDS criteria to read:</p> <ul style="list-style-type: none"> Sustainable drainage measures will be implemented to ensure no increase in the risk of surface water flooding to the site or nearby properties; <u>and provision of sustainable measures (source control, conveyance, attenuation) to deliver the wider additional benefits of SUDS.</u> 	

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			<p>look for the opportunities to create new green and blue open space wherever possible. Rainwater harvesting or grey water recycling should be considered where applicable to manage surface water runoff and mitigate the risk of flooding and water scarcity.</p> <p>This change should be applied to all the strategic site allocation policies (including EC2 new Employment land).</p>		
25.	Strategic Housing Site Allocation Policies HO9 – HO32	3N	<p>3.Effective</p> <p>ECC seek further discussion with CPBC before the Local Plan is submitted to ensure the Site allocation Policy requirements (including master plans, planning and /or development briefs) fully reflect the transport requirements and mitigation measures as set out in the Transport Evidence (2015, 2018, & 2019).</p> <p>This includes for example the active and sustainable and passenger / public transport measures, including the best practice provision for new bus services and routes to be within 400m of new developments (please see comments in response to policies TP4 and TP6).</p>	CPBC to review with ECC the site allocation policy requirements (HO9 – HO32) and EC2, fully reflect and secure the transport mitigation requirements as set out in the Transport Evidence (2015,2018 & 2019), and to incorporate changes arising from the ongoing I transport matters being addressed by CPBC in liaison with ECC	Y

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			This should include the subsequent updates and amendments being explored by CPBC and ECC in relation to on-going discussions regarding transport matters		
26.	Strategic Housing Site Allocation Policies HO9 – HO32	3N	<p>3. Effective</p> <p>Change required for clarification. To provide here is greater potential for active and sustainable travel including integration with wider proposals of the A13 as a passenger transport corridor. Change for clarification.</p> <p>ECC suggest CPBC consider commissioning an a “Local Walking and Cycling Infrastructure Plan, with integrated passenger transport” (LCWIP+) to support connectively improvements to and arising from the planned growth and sites HO9 – 32, and new employment sites within Policy EC2.</p>	<p><u>Change 1</u> Review and change Policies HO9-32 (and EC2) site policy criteria to clarify and promote the active and sustainable transport and Public Transport improvements (including contributions).</p> <p>Suggested text: <i>Ensure access to public transport facilities and services in order to promote <u>active and</u> sustainable transport patterns.</i></p> <p>In particular but not limited to the following sites: HO9 HO10 HO11 HO13 HO15 HO16 HO17 HO21 HO23</p>	Y

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				<u>Change 2</u> CPBC to consider the preparation of a “Local Walking and Cycling Infrastructure Plan, with integrated passenger transport” (LCWIP+) to support connectivity improvements to and arising from the planned growth and sits HO9 – 32, and the new employment sites set out within Policy EC2.	
27.	Land West of Benfleet Policy HO9 (1)	3N	<p>3. Effective Welcome the reference to a new nursery and primary school however for clarity, the reference to nursery should be changed to Early Years and Childcare provision (to reflect the service) and that the provision is to be co-located with a primary school.</p> <p>Welcome the reference to 2.9ha of land for a school and early years and childcare provision, however, for clarity and deliverability reasons, the policy needs to be amended to clearly state both the size of the land required and this must be allocated for D1 Education use.</p> <p>This is necessary for viability and deliverability purposes to support implementation of the development and the necessary infrastructure.</p>	<p>Change policy HO9 (1) to read</p> <p>1. Land West of Benfleet, as identified on the Policies Map, is allocated for residential purposes, to deliver 850 new homes; <u>a new co-located nursery and primary school and Early Years and Childcare provision (2.9ha of D1 Education use land)</u>; medical facilities; a residential care home; and, associated infrastructure as identified in the Infrastructure Delivery Plan.</p>	Y

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28.	Land West of Benfleet Policy HO9 (2d)	3N	3.Effective ECC welcome the requirement for the provision of 2.9ha of land, however the Local Plan does not allocate a specific agreed piece of land for the new school and early years and childcare provision. For clarify the policy should be amended to require the piece of land to be allocated to meet ECC's site suitability criteria as set out in "ECC's Developers' Guide to Infrastructure Contributions."	Change Policy HO9 (2d) to read: 2d. 2.9ha of D1 Education use land to deliver a new primary school with commensurate Early Years and Childcare provision, with associated play space; <u>in accordance with the criteria for suitable new school sites, set out within ECC's Developers Guide to Infrastructure Contributions.</u>	Y
29.	Land West of Benfleet Policy HO9(2) (c) Paragraphs 10.18 – 10.19	3N	2.Justified 3.Effective <u>Change 1:</u> ECC object to the policy restriction of "no through road." Justification through further transport evidence is required before ECC could support the proposal. The transport evidence needs be justified to support the "no through road restriction" compared to the alternative proposal of a through road. ECC needs to be satisfied that the "no through road" restriction would secure the	Change 1 Change policy HO9(2)(c) based upon the outcomes of the additional transport evidence that CPBC is commissioning with ECC to address ECC's objections. Change 2: Change Policy HO9 (2)(c) to clarify the transport evidence requirements in respect of the new roundabout on the A130 Canvey Way, and to secure the additional evidence in liaison with ECC as Highways Authority.	Y

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			<p>least impact and the required mitigation for the individual and cumulative impact and improvements on the performance of the strategic route network, including the immediate junctions such as Tarpots. Subject to the outcome of this evidence changes may be required to Policy HO9(2)(c)</p> <p>ECC welcome the opportunity to work with CPBC on the additional transport modelling evidence being commissioned to address this matter.</p> <p><u>Change 2:</u> As stated in the ECC's response to question 23 of the 2018 regulation 18 consultation, the concept of a new access on A130 and dualling of the A130 is supported.</p> <p>ECC seeks clarification on the additional transport modelling referenced in HO9(4c) regarding a new roundabout access on the A130 Canvey Road.</p> <p>ECC can advise that the issue is the need for further consideration given to the sequencing of works in respect of the dualling of the A130 between the new roundabout and Sadlers Farm</p>		

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			roundabout (the northern section) and the provision of the new roundabout.		
30.	Land West of Benfleet HO9 Paragraph 10.19	3N	3.Effective Change paragraph 10.19 to recognise that there will be an additional requirement to secure funds for bus services as parts of site would be well outside the 400m walk to existing services. This would be in accordance with the requirements set out in ECC's Developers' Guide to Infrastructure Contributions.	Change paragraph 10.19 to clarify the additional requirement for contributions towards the bus service	Y
31.	Land between Felstead Road and Catherine Road, Benfleet Paragraph 10.25 and Policy HO10 (2)	3N	3.Effective ECC note the reference to the site's proximity to schools (Kent's Hill Infants, Kent's Hill Junior and Holy Family RC), however the text and policy imply that the key consideration is avoiding any off-site impact on the road network. ECC considers that this could have a negative impact on the environment around the schools. Change Policy HO10 and Paragraph 10.25 to include consideration of the environment around schools i.e. air quality, noise, pupil safety plus walking and cycling routes.	Change paragraph 10.25 and Policy HO10(2) to read: <i>10.25 Given the proximity to the two primary schools and the access onto the A13, consideration should be given to how additional traffic flows in the area around this site will be accommodated and directed to minimise off-site junction congestion; and a negative impact on the environment around the schools. The need for improving public transport facilities and services to encourage their use is required.</i> Change policy HO10(2) for the Master Plan to make provisions to address any off-site impacts on environment around the schools i.e. air quality, noise, pupil safety plus walking and cycling routes	Y

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32.	Glyders Paragraphs 10.26 – 10.29 and Policy HO11	3N	<p>3.Effective</p> <p>Change for clarification. There is a need to consider and include specific transport improvements within the development brief to include improvements to the active and sustainable transport and public transport network to improve network connectivity and to promote modal shift.</p> <p>For example, the potential to integrate the existing bus network on the B1014 and walking / cycle routes with Benfleet Rail Station, including links with the existing off road route to the south that links with Station Road as a leisure and commuter route.</p>	<p>Change Policy HO11(2)(f) to read</p> <p><i><u>f. Main vehicular access to the site will be from Glyders and to secure network improvements for active and sustainable travel and public transport to improve connectivity and promote modal shift.</u></i></p>	Y
33.	Land East of Rayleigh Road, Hadleigh Policy HO13 (2) (i)	3.N	<p>3.Effective</p> <p>ECC welcome the requirement in policy HO13 part 2i for the provision of 1.3ha of land for Early Years and Childcare provision, however, for clarity and deliverability reasons, the policy needs to be amended to clearly state both the size of the land required and this must be allocated for D1 Education use.</p>	<p>Change Policy HO13 (2i) to read:</p> <p><u>2.i. Provision of 1.3ha of D1 Education use land (circa 0.13 hectares) for a stand-alone early years and childcare nursery; and</u></p>	Y

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			<p>This is necessary for viability and deliverability purposes to support implementation of the development and the necessary infrastructure.</p> <p>The policy wording should be changed to clearly denote the need to provide 1.3ha of land allocated for D1 Education use.</p>		
34.	Land East of Rayleigh Road Paragraph 10.39 and Policy HO13.	3N	<p>2. Justified 3. Effective</p> <p>ECC object to paragraph 10.39 imposing a restriction of “no through road” and lack of clarity in Policy HO13 on this matter. Justification through further transport evidence is required before ECC could support the proposal.</p> <p>The transport evidence needs to be justified to support the “no through road restriction” compared to the alternative of a through road. ECC as Highways Authority needs to be satisfied that the “no through road” restriction would secure the least impact and the required mitigation for the individual and cumulative impact and improvements on the performance of the strategic route network, including the A129 and immediate junctions such as Stadium Way, and Woodmans Arms Junction with Daws Heath</p>	<p>Change policy HO9(2)(c) based upon the outcomes of the additional transport evidence that CPBC is commissioning with ECC to address ECC’s objections.</p> <p>Change Paragraph 10.39 and policy HO13 based upon the outcomes of the additional transport evidence that CPBC is commissioning with ECC to address ECC’s objections.</p>	Y

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			Road. Subject to the outcome of this evidence changes may be required to Policy HO9(2)(c) ECC welcome the opportunity to work with CPBC on the additional transport modelling evidence that has been commissioned to address this matter.		
35.	Land East of Rayleigh Policy HO13(4)	3N	2. Justified 3. Effective Change policy HO13(4) for clarification. To strengthen the requirements of the master plan to include provision for active and sustainable travel; and for the provision of public transport access to/through the site and contributions to services. This is necessary for a development of this size to meet the best practice 400m walking threshold used by ECC to improve connectivity and promote modal shift.	Change Policy HO13(4) to include the active and sustainable measures and the provision of a public transport route for buses through the site to ensure access to public transport facilities within 400m from within the development.	Y
36.	Land at Brook Farm, Hadleigh Paragraph 10.45 and Policy HO14	3N	3. Effective Change paragraph 10.45 for clarification. To include consideration of access to/through the site for active and sustainable travel and public transport to improve connectivity and modal shift, given the size of the allocation to enable services	Change HO14(3)(h) to require improvements to the active and sustainable transport networks to improve connectivity and promote modal shift Change HO14(5) to include access for public transport provision within the site, in addition to support to	Y

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			<p>within the 400m walking threshold for used by ECC for the provision of public transport.</p> <p>Change for clarification. To provide greater potential for active and sustainable travel including integration with wider proposals, including the greenways proposed in policy HO14(3)(d).</p>	contribution to be made to improvement of public transport services along Daws Heath Road	
37.	Land South of Scrub Lane Hadleigh Policy HO15(2) P47	3N	<p>3.Effective</p> <p>Change Policy HO15(2) and (3) for clarification. To strengthen the requirements of the development brief to include contributions to improve access to public transport, for this development which is outside the best practice 400m walking threshold used by ECC to improve connectivity and promote modal shift.</p>	Change supporting text and policy HO15(2) and (3) to ensure the development brief includes contributions towards public transport improvements.	Y
38.	Land at Oak Tree Farm, Hadleigh Policy HO16	3N	<p>3.Effective</p> <p>Change Policy HO16(2) and (3) for clarification. To strengthen the requirements in the master plan approach to include contributions to improve access to public transport, for this development which is outside the best practice 400m walking threshold used by ECC to improve connectivity and promote modal shift.</p>	Change supporting text and policy HO16(2) and (3) to ensure the master plan approach includes contributions and provision for public transport improvements and bus service infrastructure on A13 corridor	Y

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39.	Hadleigh Island, Hadleigh HO17,	3N	3.Effective Change Policy HO15(2) and (3) for clarification. To strengthen the requirements of the development brief to include provision for active and sustainable travel and public transport improvements (including contributions), given the potential for Hadleigh town centre to become a transport interchange and linkages with the A13 aspirations as a public transport corridor.	Change supporting text and policy HO17 (2) and (3) planning and development brief approach to include provision for active and sustainable transport and public transport improvements, including the potential for Hadleigh town centre to become a transport interchange	Y
40.	Land at Glebelands, Thundersley Paragraph 10.65 and HO19(2)	n/a	3.Effective Change paragraph 10.65 for clarification. To include the Highways Authority requirement for the transport assessment to include consideration of any impacts arising from the development on the Tarpots/A13 junction.	Change paragraph 10.65 to require the transport assessment to consider any impacts arising from the development on Tarpots/A13 Junction.	
41.	The Chase, Thundersley Policy HO20(2h)	3N	3.Effective Change for clarification. To ensure consistency and deliverability of Early Years and Childcare Provision, change Policy HO20(2h) to clearly state the size of the land and to allocate it for D1 Education use.	Change policy HO20(2h) to read 2h. Provision of 0.058 ha of D1 Education use Land (circa 0.058 ha) for a stand-alone 26 place Pre-school (Use Class D1); and	Y
42.	Land fronting Rayleigh Road,	3N	3.Effective Change Policy HO21(2) and (3) for clarification. To strengthen the requirements of the master	Change supporting text and policy HO15(2) and (3) to ensure the development brief includes contributions towards public transport improvements.	Y

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	Thundersley Policy HO21		plan to include provision for active and sustainable travel and public transport improvements (including contributions), for this development which, is outside the best practice 400m walking threshold used by ECC.		
43.	Land East of Canvey Road, Canvey Policy HO23(6)	3N	3.Effective Change required for clarification to HO23(6). To strengthen the requirements of the master plan to include provision for active and sustainable travel; and for the provision of public transport access to/through the site and contributions to services. This is necessary for a development of this size to meet the best practice 400m walking threshold used by ECC to improve connectivity and promote modal shift.	Change policy HO23(3) and (6) to include the active and sustainable measures and for the provision public transport access to/through the site (and contributions).	Y
44.	Land East of Canvey Road, Canvey Policy HO23	n/a	3.Effective 4.Consistent ECC draws your attention to the Scheduled Monument on this site and recommend that the council consider the matter in accordance with the NPPF, relevant legislation and in liaison with Historic England.	CPBC to consider the presence of the Scheduled Monument in accordance with the NPPF, relevant legislation and in liaison with Historic England.	

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45.	Land at Thorney Bay Caravan Park, Canvey Island Policy HO25	3N	<p>3.Effective 4. Consistent</p> <p>ECC's response to the Regulation 18 consultation (July 2018), raised the need for CPBC to undertake a Minerals and Waste Consultation Area assessment on the proposed site allocations, in compliance with the adopted Essex Minerals Local Plan 2014 and Essex and Southend on Sea Waste Local Plan 2017 (WLP).</p> <p>In October 2019, ECC advised CPBC with regards to any potential mineral and waste safeguarding implications that may occur as a result of the then proposed housing and employment allocations to be brought forward in the emerging Local Plan.</p> <p>ECC identified that the site HO25 Thorney Bay proposed is within land designated as a Waste Consultation Area (WCA) in the WLP.</p> <p>ECC requested that</p> <ul style="list-style-type: none"> an informative is included with the sites allocation policy, setting out the requirements for a Waste Infrastructure Assessment (WIA), should the site be allocated for development within the emerging Castle Point Local Plan. 	<p><u>Change 1.</u> Change Policy HO25, to include a new site requirement to prepare a Waste Impact Assessment in accordance with WLP Policy 2. This includes reference to the need to contact the Waste Planning Authority to promote early engagement and implementation of the Development Plan.</p> <p>ECC suggest a new policy site requirement 6 to read:</p> <p><u>6. The allocation falls within a Waste Consultation Area, making it subject to Policy 2 of the Adopted Essex and Southend-on-Sea Waste Local Plan 2017 (or its future equivalent). A Waste Infrastructure Assessment will be required as part of any planning application made on this site.</u></p> <p><u>Change 2</u> The supporting text to Policy EC2(1) should be updated to reflect the requirements of WLP Policy 2. Details of requirements for a Waste Infrastructure Assessment could be placed directly into the Castle Point Local Plan as an appendix, or applicants could be referred to the Waste Planning Authority to receive the standard template for completing a WIA.</p>	Y

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			<p>The purpose of the WIA is to inform the planning judgement made by the WPA as required by WLP Policy 2; and</p> <ul style="list-style-type: none"> a WIA be carried out on this proposal and submitted as part of the Local Plan evidence base supporting all (non-waste) planning applications made within WCAs, in accordance with the WLP. This is supported by Guidance on what would be expected as part of a WIA. <p>ECC request that the informative be added to Policy HO25 as previously advised, in order to comply with WLP Policy 2, and that the supporting text be updated to address this matter.</p>	Please note that ECC's standard guidance with regards to what comprises a Waste Infrastructure Assessment will soon be published on ECC's website.	
46.	CHAPTER 11 Economic Strategy Paragraphs 11.3 – 11.12	n/a	<p>3. Effective 4. Consistent with National Policy</p> <p>Change for clarification. To strengthen the explanatory text to clearly state the level of planned job growth being proposed in the plan period and how they are to be aligned to policy EC2. At present the only job numbers relate to inward investment from London.</p>	It is recommended that CPBC clarify the total number of jobs within the plan period.	

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47.	Economic Strategy Paragraph 11.5	n/a	3.Effective ECC note the recognition of the below average skills levels and ECC wish to be engaged by CPBC in more detail on how to work together on this matter.	ECC recommends that CPBC engage with ECC to work in partnership to address this matter, and the changes required in the Local Plan.	
48.	Economic Strategy Paragraph 11.9	n/a	1.Positively Prepared ECC note the references to the need to improve quality of employment areas and to provide greater flexibility in the supply of premises to attract investment and encourage indigenous companies to stay in the borough as they grow. ECC wishes to draw the Council's attention to and seek reference to the following evidence: - ECC's Grow on Space Study (2017); - South Essex Grow on Space Study	Change the supporting text to include references to ECC's Grow on Space study and the emerging South Essex Grow on Space Study	
49.	Economic Strategy Paragraph 11.11 and Policy EC1	3N	3.Effective Change is required for clarification. To strengthen EC1, consideration should be given to the potential to work with partners to enhance the active and sustainable travel and the public transport network in existing employment areas and encourage a modal shift and improve accessibility to the employment areas.	Change Policy EC1(2)(a) to include reference to promote and encourage sustainable travel and public transport network improvements to improve connectivity and accessibility and encourage modal shift.	Y

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50.	Economic Strategy Paragraph 11.11	n/a	3.Effective Change paragraph 11.11 for clarification. The last sentence is incorrect, as it appears to suggest two new secondary schools have or will be delivered. This is not proposed. Please review and clarify the position.	CPBC to clarify the position regarding the status of the two new secondary schools and Skills Campus referred to in paragraph 11.11.	
51.	Strategic Policy EC1(3) and New Employment Land Policy EC2	3N	3.Effective ECC welcomes and supports Policy EC1 (3) which states that within employment areas, non-B Class Uses will be permitted if <i>“it can be demonstrated that the use will provide an equivalent number of jobs compared to an employment development falling within Use Classes B of the Use Classes Order use (sic) of the site”</i> ie sui generis uses. In contrast, Policy EC2 limits itself to new employment land only and does not include this allowance for sui generis uses as incorporated within Policy EC1. This creates an inconsistency within the emerging Plan. Change Policy EC2 to re-iterate the support for non-B Class Uses which conform to set criteria, set out in Policy EC1(3).	Change Policy EC2 for consistency, to re-iterate the support for non-B Class Uses which conform to set criteria within Policy EC1(3). It is suggested this clarification could be placed as a new subsection part (4), at the end of the policy, to save repetition under each new employment allocation within parts (1) to (3). Suggested wording: <u>4. Whilst primarily intended for development falling under the stated Use Class Order, applications for uses falling outside of the stated Use Class Order will be permitted within these employment areas where they accord with the following criteria:</u> <u>a. It can be demonstrated that the use will provide an equivalent number of jobs compared to an employment development falling within Use Class B of the Use Class Order; and</u>	Y

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			It is suggested, to avoid repetition, that the wording is placed at the end of the policy, within its own subsection. This would remove the need to be repeated the criteria for each of the proposed new employment allocations.	<u>b. It can be demonstrated that the location of the use within an employment area will not undermine the vitality or viability of local town centres or local shopping parades.</u>	
52.	New Employment Land Policy EC2(1) – (Extension to Manor Trading Estate)	3N	<p>3.Effective</p> <p>ECC's response to the Regulation 18 consultation (July 2018), raised the need for CPBC to undertake a Minerals and Waste Consultation Area assessment on the proposed site allocations, in compliance with the adopted Essex Minerals Local Plan 2014 and Essex and Southend on Sea Waste Local Plan 2017 (WLP).</p> <p>In October 2019, ECC advised CPBC with regards to any potential mineral and waste safeguarding implications that may occur as a result of the then proposed housing and employment allocations to be brought forward in the emerging Local Plan.</p> <p>ECC identified that the proposed extension to Manor Trading Estate (EC2(1) is within land designated as a Waste Consultation Area (WCA) in WLP.</p>	<p><u>Change 1</u> Change Policy EC2 (1) Manor Trading Estate, to include a new site requirement to prepare a Waste Impact Assessment in accordance with WLP policy 2. This includes reference to the need to contact the Waste Planning Authority to promote early engagement and implementation of the Development Plan.</p> <p>ECC suggest the following wording for a new policy criteria policy EC2(1) (d) to read:</p> <p><u>d. The allocation falls within a Waste Consultation Area, making it subject to Policy 2 of the Adopted Essex and Southend-on-Sea Waste Local Plan 2017 (or its future equivalent). A Waste Infrastructure Assessment will be required as part of any planning application made on this site.</u></p> <p><u>Change 2</u> Change the supporting text to Policy EC2(1) to reflect the requirements of WLP Policy 2. Details of the requirements for a Waste Infrastructure Assessment</p>	Y

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			<p>ECC requested that</p> <ul style="list-style-type: none"> an informative is included with the sites allocation policy, setting out the requirements for a Waste Infrastructure Assessment (WIA), should the site be allocated for development within the emerging Castle Point Local Plan. The purpose of the WIA is to inform the planning judgement made by the WPA as required by WLP Policy 2; and a the WIA be carried out on this proposal and submitted as part of the Local Plan evidence supporting all (non-waste) planning applications made within WCAs. This was supported by Guidance on what would be expected as part of a WIA. <p>ECC request that the informative be added to Policy EC2(1) as previously advised, in order to comply with WLP Policy 2, and that the supporting text be updated to address this matter.</p>	<p>could be placed directly into the Castle Point Local Plan as an appendix, or applicants could be referred to the Waste Planning Authority to receive the standard template for completing a WIA.</p> <p>Please note that ECC's standard guidance with regards to what comprises a Waste Infrastructure Assessment will soon be published on ECC's website.</p>	
53.	New Employment Policy EC2 and Paragraphs 11.15 – 11.28	3N	<p>3.Effective</p> <p>Change Policy EC2 and Paragraphs 11.15-11.28 for clarification.</p>	Change policy EC2 and paragraphs 11.15 – 11.28 to include provision of active and sustainable transport and public transport, to improve connectivity and promote modal shift.	Y

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			<p>To strengthen the requirements and provision for improvements to of active and sustainable travel including public transport, as set out in Policies TP3 – 6, to improve connectivity and modal shift.</p> <p>This could include preparation of travel plans, provision of cycling facilities and improvements to public transport network to promote and encourage modal shift at peak times in particular.</p>		
54.	Canvey Seafront Entertainment Area Policy EC3	3Y	<p>3.Effective</p> <p>ECC welcome Policy EC3 which supports the tourism industry in an area with strategic locational advantages for such uses</p> <p>ECC also note the role of creative workshops that can contribute to seaside / tourism activities, with appropriate restrictions to safeguard against 'bad neighbour' effects. These could be of assistance to CPBC to consider such opportunities in the emerging masterplan, in due course.</p> <p>ECC wish to be engaged with the future work on the merging masterplan and would welcome the opportunity work with CPBC in respect of skills</p>	None	

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			modelling and how local people will be supported to benefit from growth and change.		
55.	Canvey Town Centre and Hadleigh Town Centre Regeneration Policy TC2	3Y	3.Effective ECC as Highways authority wish to be engaged in this matter, to promote active and sustainable transport and public transport improvements	None.	
56.	Hot Food Takeaway Outlets Policy TC6	3Y	3.Effective 4.Consistent with National Policy ECC welcome and support policy TC6, which is in accordance with NPPF and consistent with the Local Plans' health and wellbeing strategy and policies HS1 and HS4. ECC in its role as lead Public Health advisor wish to be engaged by CPBC in addressing this matter.	None.	
57.	Strategy for Healthy Communities Paragraph 13.16	3Y	3.Effective 4.Consistent with National Policy ECC welcomes and supports the references to the Essex Joint Health and Wellbeing Strategy (2018 – 2020). The next edition will be published in 2023.	Change paragraph 13.16 to read: 13.16 One of the <u>action points in the Essex Joint Health and Wellbeing Strategy 2018-2022 (and successor documents)</u> action points is to reduce the numbers of people becoming dependant on health and adult social care by facilitating the best conditions for carers to operate. This includes increasing the	

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			Change for consistency. To keep the Local Plan reference to this document up to date, insert <i>"and successor documents"</i> .	proportion of carers who find it easy to find information about support.	
58.	Strategy for Healthy Communities Paragraph 13.17	3Y	<p>3.Effective 4.Consistent with National Policy</p> <p>ECC support the references to and requirement for Health Impact Assessments, in accordance with the Essex Planning Officers' Association Health Impact Guidance 2008.</p> <p>Change for clarification and update references to the new EPOA Health Impact Assessment Guidance published in 2019. Consideration should be given to removing the dates from the Guidance to enable the Local Plan, to recognise successor documents</p>	Change paragraph 13.17 to recognise the latest 2019 HIA Guidance and successor documents.	
59.	Strategy for Healthy Communities	n/a	<p>2.Justified 3.Effective</p> <p>ECC support policy HS3, including the requirements for Health Impact Assessments and the approach to consider healthy lifestyles and active design principles throughout the Local Plan.</p>	None	

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60.	Opportunities for Indoor Leisure and Sports Strategic Policy HS2	n/a	<p>3.Effective</p> <p>ECC note the approach to encourage the use of multi-functional community halls and school halls, identifying potential development in Benfleet, Hadleigh and Thundersley.</p> <p>These multi-functional hubs may have the potential to provide workspace for the third sector and social enterprises, as well as generating income to cross-subsidise the provision of public services.</p> <p>ECC suggest that CPBC may wish to include consideration of such opportunities when proposals for individual premises are developed.</p>	CPBC to consider including provision for the wider opportunities of multifunctional community facilities	
61.	Opportunities for Outdoor Recreation Paragraph 13.30	n/a	<p>3.Effective</p> <p>ECC wish to draw attention to the emerging Green Essex Strategy, which is aligned to the strategies in paragraph 13.30, and is being prepared in partnership by ECC and Essex authorities</p>	CPBC to consider changing Paragraph 13.30 to recognise the emerging Green Essex Strategy.	
62.	Education, Skills and Learning Paragraph 13.39	n/a	<p>3.Effective</p> <p>Change for clarification. To correctly reflect the variety and range of early years and childcare</p>	<p>Change Paragraph 13.39 to read:</p> <p>13.39. For the purpose of this policy, education facilities include, but are not limited to: early years and childcare</p>	

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			<p>EYCC provision available, which extends beyond those listed.</p> <p>In addition, ECC notes that the list provided is not exhaustive, however for clarity the reference to 'sixth form' should be changed to 'Post-16 education', to reflect the role of the vocational sector. This will also align with the IDP which refers to Post 16 education.</p>	<p>(pre-schools, nurseries, primary school nurseries, independent schools, out of school clubs and childminders), schools (primary, secondary and sixth form Post 16 Education), young people with special educational needs and disabilities, colleges, libraries, youth facilities, employment and skills measures and other community learning spaces.</p>	
63.	Paragraph 13.41	n/a	<p>3.Effective</p> <p>Change paragraph for clarification. To fully reflect the title and purpose of the Ten Year Plan and EYCC's Five Year Plan.</p> <p><u>Change 1</u></p> <ul style="list-style-type: none"> Change the title of the Ten Year Plan to accurately reflect the full title of the document and that the date is removed. Please note the Essex School Organisation Service's Ten Year Plan is subtitled 'Meeting the demand for school places in Essex'. It is published annually, and the 2020-2029 edition will be published shortly. 	<p>Change paragraph 13.41. to read:</p> <p>13.41 Essex County Council (ECC) as Education Authority has the responsibility for early years and school place planning. Through this process ECC identifies the need school places and identifies surpluses or deficits through a 40 <u>Ten Year Plan Meeting the demand for School Places in Essex" (2019-2028)</u>. Places for early years and childcare as assessed <u>through a provider termly headcount and published annually, and forecast, through a 5-year Plan</u>. This informs the service on the need for additional <u>sustainable, high-quality early years and childcare provision that meet the needs of the community.</u></p>	

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			<p>Change 2</p> <ul style="list-style-type: none"> Remove the reference to the EYCC Five Year Plan and change the text, to reflect how it is used to assist forecasting in addition to the sufficiency data. Please note the plan has not been published and it should not be referred to at this time. 		
64.	Paragraph 13.46	n/a	<p>3.Effective</p> <p>Change for clarification. To strengthen the text by fully reflecting the EYCC offer and amendments are required.</p>	<p>Change Paragraph 13.46 to read:</p> <p>The Essex Early Years and Childcare service report a likely increase in the demand for the provision of spaces in nurseries and pre-schools as have reported <u>an increase in the demand for the provision of spaces</u> as the Extended Funding Entitlement (EFE) changes took effect in September 2017, Which now enable working families to <u>The EFE enables eligible working families to access up to an additional funded 15 hours for 3-4-year olds; and this has placed a further need for full day care and wrap around provision within the Borough.</u></p>	
65.	Paragraph 13.47	n/a	<p>3.Effective</p> <p>Change is required for clarification. The information contained within the paragraph is incorrect and has not been provided by the ECC EYCC service for use in this Plan. The</p>	<p>Change Paragraph 13.47 to read</p> <p>Essex County Council provides data for Early Years and Childcare. Their 2018 data found that except for South Benfleet all areas in Castle Point have an average cost per term less than £2,905 with the majority of Canvey Island being less than £1,375 per</p>	

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			information is not relevant to this Plan and should be deleted.	term . The borough appears to have a relatively good <u>supply provision</u> with most areas having vacancies for 2, 3 and 4-year olds. However, there is a need for new provision arising from the proposed level of growth and details of the new provision is set out within the respective developments.	
66.	Paragraph 13.52	n/a	3.Effective ECC welcome the reference to and recognition of the need for commensurate contributions to support measures for employment and skills. This is a matter to be addressed in the ECC revised Developers' Guide to Infrastructure Contributions which was consulted in 2019 and is expected to be adopted in 2020.	No change required	
67.	Paragraph 13.58 Libraries	n/a	3.Effective ECC welcome and support the reference to Library services and recommend that the IDP is updated to include this provision as part of developer contributions to infrastructure, in accordance with policy HS4 and SD2.		
68.	Education, Skills and Learning Policy HS4(3)	3N	3.Effective ECC welcomes policy HS3, however Policy HS3(4) only refers to residential development and should be amended to include employment sites.	Change Policy HS4(3) to read: 3. Where the cumulative impacts of residential <u>and employment</u> development within a local area increase demand for education facilities beyond those available, development will be required to	Y

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			This is necessary to reflect the full requirements of the “ <i>ECC Developers’ Guide to Infrastructure Contributions</i> ” which seeks contributions from employment sites for Early Years and Childcare provision in appropriate circumstances.	make proportionate contributions to support capacity improvements to education infrastructure.	
69.	Transport Strategy Paragraph 14.2 – 14.3	n/a	<p>2. Justified</p> <p>Change required for clarification. The role of ECC as the Highways and Transportation Authority should be clearly referenced, and the policy context of the Local Transport Plan expanded to include the 5 strategic outcomes.</p> <p>For context it is recommended reference is made to the Highway Authority supporting Policies and Plans and Guides including, but not limited to</p> <ul style="list-style-type: none"> • A127 A corridor for Growth: An Economic Plan • ECC Developers Guide to Infrastructure Contributions • Essex Sustainable Modes of Transport Strategy 2019 • Getting around in Essex A bus and passenger transport strategy 2015 • Draft Essex Walking Strategy 2019 • Essex Walking Strategy 2001 • Essex Cycling Strategy Nov 2016 	Change paragraph 14.3 and include additional text to recognise the role of ECC as the Highways and Transportation Authority, and provide highway policy context with reference to the Local Transport Plans 5 strategic outcomes in the LTP, and ECC’s supporting transport strategies, policies and guides, in support of policy TP1	

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			<ul style="list-style-type: none"> Essex Public Rights of Way Improvement Plan 2013 		
70.	Paragraph 14.5	n/a	2. Justified 3. Effective CPBC has actively engaged ECC in the preparation and development of the new 2018 and 2019 Transport Evidence, which is ongoing. CPBC are aware and addressing a number of points, which ECC consider could be addressed through further transport evidence.	CPBC to continue to work with ECC on an ongoing basis to provide the necessary clarification and additional transport modelling evidence, prior to submission, so that any changes to the Local Plan can be applied.	
71.	Improvements and alterations to Roads – Section Paragraph 14.10 And Improvements and Alterations to Carriageway Infrastructure Policy TP2	3N	3. Effective Change required for clarification. The title of the section and policy TP2 should be consistent and fully reflect the purpose of the section/policy which is concerned with “Highways Infrastructure” which extends beyond “carriageway”	Change the title of the section and policy TP2 “ <u>Improvements and Alterations to Highways Infrastructure</u> ”	Y

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72.	Improvements and alterations to Roads – Section Paragraph 14.13	n/a	3.Effective Change is required for clarification. An additional sentence is required to clarify that some of the schemes such as Extension to Roscommon Way (Phase 3) and New Access for Canvey Island will require external funding from government	Change paragraph 14.13 to read “The schemes listed in the table below are at early stages of progression, and do not currently have identified funding mechanisms in place <u>(including external funding from central government)</u> to support their implementation. “..	
73.	Strategic Highway Improvements Table 14.1 Extension to Roscommon Way (Phase 3)	n/a	Effective Extension to Roscommon Way (Phase 3) For clarification ECC can provide the following position statement on this scheme: ECC recognises the need for Roscommon Way Phase 3 and supports the concept of enhancing connectivity within the Canvey Island. Additional feasibility work needs to be undertaken as the result of an overall package of work to consider access and egress to, from and within Canvey Island. The proposals would cross environmentally significant areas, need robust and sensitive engineering requirements and most likely be required to be constructed with a raised elevation.	None	

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			At the present moment ECC is not resourced to bring this project into its capital programme and progress until such time as there is an opportunity to draw in the necessary developer or government funding to support not just the delivery of the schemes but also the very extensive design and development stages.		
74.	Strategic Highway Improvements Table 14.1 New access for Canvey Island	n/a	<p>3.Effective</p> <p>New access for Canvey Island For clarification ECC can provide the following position statement on this scheme:</p> <p>Whilst ECC supports the concept new transport infrastructure and a third access to Canvey Island to enhance connectivity of the Island, there is no ECC funding for these schemes,</p> <p>A project of this scale would require central government funding and support from the Department for Transport (DfT).</p> <p>However, with the industrial activities occurring on the Island there is also the element of local and national resilience. Benefits of improved access and egress from Canvey Island will have major impacts on industry at a significant level</p>	None	

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			<p>owing to the supply of fuel to the aviation sector, as well as gas from the main Port Facilities.</p> <p>Any of the proposed routes would cross environmentally significant areas, including a SSSI; this is particularly true of a new western route. There are also robust engineering requirements pertaining to the engineering of the route, because it will most likely require to be constructed with a raised elevation, to mitigate against flood risk and to cross a navigable river linking to the Thames.</p> <p>ECC anticipate that ASELA would explore such matters as a new Third Access to Canvey Island as part of the ongoing cross boundary collaboration to agree what new roads, improvements to existing routes and public transport options will be necessary to meet the planned housing, population and job growth for South Essex as a whole..</p>		
75.	Strategic Highway Improvements Table 14.1	n/a	<p>3.Effective</p> <p>Improved Access to Canvey Island For clarification ECC can provide the following position statement on this scheme:</p>	Change “widening Somnes Avenue” requirements to include bus priority lane(s)	

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	Improved Access to Canvey Island		<p>ECC is considering options to improve general access to the Island, including to dual Canvey Way, dual only the mainland sections (in the vicinity of Sadlers Farm A13/A130 and the new roundabout access to site allocation HO9); and/or to have a tidal system (3 lane). This project is of significance and is a scheme that ECC is currently submitting funding bids to government.</p> <p>Change required for clarification. The reference to "Somnes Avenue widening" should be changed to include 'at least' a tidal flow bus lane, to facilitate passenger transport journey times to Benfleet Station and increase frequencies within existing bus resource levels</p>		
76.	<p>Strategic Highway Improvements Table 14.1</p> <p>A127 Corridor for Growth and route management Strategy</p>	3N	<p>3.Effective</p> <p>A127 Corridor for Growth and route management Strategy</p> <p>Change is required for clarification. To include reference to safeguarding of land as necessary to facilitate future transport improvements, which forms part of the remit of the A127 Task Force.</p>	<p>Change table to include safeguarding of land as necessary to facilitate future transport improvements.</p> <p>Change the Policies Map annotations to include safeguarding the section of A127 within the borough.</p>	Y

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77.	Strategic Highway Improvements Table 14.1 A129 Route Improvements	n/a	3.Effective A129 Route Improvements Change is required for clarification. Further transport evidence is required to consider if sustainable transport infrastructure would be able to accommodate a significant proportion of traffic movements to avoid other road infrastructure upgrades such as the Stadium Way to Daws Heath Road as a through road. This will need to be considered as part of the additional transport evidence required for HO13.	CPBC to continue to work with ECC to develop the additional transport evidence required for A129, in conjunction with the additional transport evidence and outcomes that CPBC is progressing with ECC for site HO13 (see ECC response to HO13).	
78.	Strategic Highway Improvements Table 14.1 Canvey Way / A13 Slip road	n/a	3.Effective Canvey Way / A13 Slip road Change is required for clarification. Further transport evidence is required and should be considered as part of the requirements of Policy HO9 (land West of Benfleet) and the options being considered under “Improved Access to Canvey Island” as set out above in response to Policy HO9 and listed above in Table 14.1.	CPBC to continue to work with ECC to develop the additional transport evidence required for Canvey Way / A13 slip road, in conjunction with the additional transport evidence and outcomes that CPBC is progressing with ECC for site HO9 (see ECC response to HO9); and as part of the options under consideration for “Improved access to Canvey Island”.	
79.	Highway Improvements from Growth Table 14.2	n/a	3.Effective Changes are required for clarification. To strengthen the transport requirements to include the following schemes	Change Table 14.2 to include the omission scheme	

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			Change to include the following scheme as listed in Table 25 of the IDP <ul style="list-style-type: none"> Pedestrian and cycle access to Benfleet train station 		
80.	Highway Improvements from Growth Table 14.2	n/a	3.Effective ECC can advise that the other proposals, such as the links in Canvey Island and public transport improvements, have the potential to reduce highway demand though the strategic junctions such that Local Plan impacts will be further mitigated, however, the extent to which those proposals may achieve that effect is not assessed.	none	
81.	Improvements and Alterations to Carriageway Infrastructure Policy TP2(1)(a)	3N	3.Effective Change is required for clarification to Policy TP2(1)(a). The title of the “A127 Growth Corridor Strategy” should be changed to reflect the correct title for the document.	Change 1 Policy TP2(1) to read: <i>a. A127 A Corridor for Growth An Economic Plan Corridor Strategy;</i>	Y
82.	Improvements and Alterations to Carriageway	3N	3.Effective Change is required for clarification. The list of improvements and alterations to carriageway	<u>Change 1</u> Change Policy TP2(2) include a new additional improvement to read:	Y

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	Infrastructure Policy TP2(2)		<p>infrastructure in Castle Point and safeguarded areas to be denoted on the Policies Map should be extended to include the A127. This is to reflect the “A127 A Corridor for Growth: An Economic Plan”, as referenced in Policy TP2(1)(a).</p> <p>This is required to be consistent with ECC response to Table 14.1 “A127 A Corridor for Growth and Route”.</p>	<p>f. <u>A127 corridor</u></p> <p><u>Change 2.</u> Change Policies Map to denote the A127 Corridor within the borough as a “Transport Improvement Area”</p>	
83.	Improvements to Footpaths, Bridleways and Cycling infrastructure Section and Policy TP3	3Y	<p>3.Effective</p> <p>Change is required for clarification. The title of the section and policy should be changed to “<i>Active and Sustainable Transport Infrastructure</i>” to clearly reflect the purpose of the section and policy and to include all forms of active and sustainable travel and the full range of infrastructure improvements.</p>	Recommend CPBC change the title of the section and policy TP3 is changed to “Active and Sustainable Transport Infrastructure”.	
84.	Improvements to Footpaths, Bridleways and Cycling infrastructure Paragraph 14.16	3Y	<p>3.Effective</p> <p>Welcome the reference to “Travel Plans” however, there is no provision or requirement for these to be prepared on new development sites, including the required residential and business travel planning interventions put in place; this would be dependent on size of site as each</p>	Change the Paragraphs 14.19 – 14.25, to include a requirement for Residential and Business Travel Plans to be prepared on new developments.	

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			<p>intervention comes in at different levels of thresholds of development. Given the plan period to 2033, ECC as Highways Authority would expect to see the interventions be at the required threshold at the time of development, as referenced and set out in ECC Developers' Guide to Infrastructure Contributions.</p> <p>Paragraphs 14.19-14.25. ECC would expect to the reasoned justification to include references to the following ECC evidence and strategies (and successor documents)</p> <ul style="list-style-type: none"> • ECC Developers' Guide to Infrastructure Contributions • Essex Sustainable Modes of Transport Strategy 2019 • Getting around in Essex A bus and passenger transport strategy 2015 • Essex Walking Strategy 2001 • Draft Essex Walking Strategy September 2019 • Essex Cycling Strategy Nov 2016 • Essex Public Rights of Way Improvement Plan 2013 		
85.	Improvements to Public Transport Infrastructure and Services	3Y	<p>3.Effective</p> <p>Change is required for Clarification. The explanatory text should be strengthened by</p>	CPBC to change paragraph 14.29 and reconsider Policy TP4 in respect of the approach to rail travel and potential improvements to Benfleet Railway station.	

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	Paragraph 14.29 and 5 Policy TP4		including reference to the potential improvements to Benfleet Railway station, given that a total of 15.7% of the borough's working population travel to work by train. Policy TP4 also makes no reference to rail travel.		
86.	Highway Impact Paragraph 14.37 Policy TP5	3Y	<p>3.Effective</p> <p>Change is required for clarification. Paragraph 14.37 should be expanded to support Policy TP5.</p> <p>For example all new developments (business and residential) should be required to provide and implement Travel Plans as set out in ECC Developers' Guide to Infrastructure Contributions</p> <p>CPBC to work with businesses, developers and community service providers to improve accessibility to key services and facilities through the use of travel plans and to ensure that new premises-facilities and residential developments are readily accessible by sustainable modes of travel. This is necessary to facilitate the modal shift.</p>	CPBC to consider expanding Paragraph 14.37, for clarity to support all the requirements within Policy TP5.	

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87.	Highway Impact Policy TP5(4)	3N	<p>3.Effective 4.Consistent with National Policy</p> <p>Change is required for clarification. To strengthen policy TP5(4), the use of planning conditions and section 106 and other legal agreements should be used in all circumstances to ensure that highway mitigation works and/or Travel Plan requirements are delivered to accompany the phasing of development.</p> <p>This would comply with the requirements of Essex Local Transport Plan, Development Management Policies and ECC's Developers' Guide to Infrastructure Contributions,</p>	<p>Change Policy TP5(4) to read:</p> <p>"In all appropriate circumstances, the Council will use planning conditions or a Section 106 Agreement to ensure that highway mitigation works and/or Travel Plan requirements are delivered to accompany the phasing of development.</p>	Y
88.	Safe and Sustainable Access Paragraphs 14.42 – 14.45	n/a	<p>3 Effective</p> <p><u>Change 1</u> Change is required for clarification. Active and Sustainable Transport and public transport improvements will play an important role to improve connectivity and promote modal shift to accommodate planned growth.</p> <p><u>Change 2</u> Change is required for clarification. The best practice standard used by ECC for the distance people to walk to access public transport for</p>	<p><u>Change 1</u> Change Paragraph 14.42 – 14.45 to recognise the additional benefits of wider provision of safe and sustainable access, to improve connectivity and promote modal shift</p> <p><u>Change 2</u> Change paragraph 14.45 to reflect best practice that access to public transport services is required to be within 400 800m of the site.</p>	

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			buses is 400m from a development. ECC will normally seek contributions from all developers to improve passenger transport network/services and/or Infrastructure		
89.	Safe and Sustainable Access Policy TP6(c)	3N	3. Effective Change is required for clarification. The best practice standard used by ECC for the distance people to walk to access public transport for buses is 400m from a development. ECC will normally seek contributions from all developers to improve passenger transport network/services and/or Infrastructure	Change Policy TP6(c) to read: <i>c. Access to public transport services within <u>400m</u> of the site.</i>	Y
90.	Landscaping (DS2) Paragraph 16.25	3N	3.Effective ECC welcome the references to the “Essex Sustainable Drainage System Design and Adoption Guidance 2016”, however please be advised that a revised SUDs Guide is due to be published in 2020. It is recommended that the reference to the guide is changed to reflect both the correct title and status of the document. This is to support the implementation of the Local Plan and to ensure the references to the SUDs Guide are kept up to date within the Local Plan period.	Change the paragraph 16.25 to read: <i>16.25..... Details on the design and adoption of SuDS can be found in the <u>ECC's Adopted Essex Sustainable Drainage Systems Design Guide Design and Adoption Guidance 2016 and referenced within the published Essex Design Guide.</u></i> This change should be applied to Whole Plan	Y

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			<p>It should also be noted that the published Essex Design Guide includes advice on incorporating SUDs to deliver quality housing schemes.</p> <p>ECC recommend that these changes are applied throughout the whole of the Local Plan (and IDP).</p>		
91.	Non tidal Flood Risk Management Paragraph 18.45	n/a	<p>3.Effective</p> <p>ECC welcome the references within paragraph 18.45, however recommend that ground testing/investigation to confirm the soil permeability is carried out.</p> <p>SUDS schemes in relation to infiltration are site specific. To evident the site hasn't had positive infiltration, ground testing report should be submitted to review.</p> <p>ECC recommend changes to paragraph 18.45 to address this matter.</p>	<p>Change Paragraph 18.45 to read:</p> <p><i>18.45. Sustainable Drainage Systems (SuDS) are useful in mitigating the impact of flooding. These take a variety of forms, some of which are more appropriate in certain locations than others. The predominant soil geology underlying Castle Point is London Clay, which is impermeable, and is prone to rapid runoff; <u>site-specific ground investigation should be undertaken to determine the local variations in soil permeability before discounting the infiltration to discharge surface water runoff from the site. If the infiltration is not found favourable the surface water attenuation using above ground features should be used wherever possible. The use of infiltration systems would not work in most cases; therefore the focus should be on the attenuation of surface water, through the use of These</u> source control mechanisms would restrict the volume and rates of the surface water runoff leaving the site. The</i></p>	

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				<i>underground storage tanks are the least favourable option and should only be used as last resort. These can restrict the volume and rates of surface water runoff leaving a site.</i>	
92.	Paragraph 18.47	n/a	3.Effective ECC welcome the references, however the paragraph is incomplete and further clarification is required. As presented the paragraph only addresses the larger development. SUDS schemes should be part of any proposed/ new developments including residential, commercial or mixed used. ECC recommend that paragraph 18.47 is amended to clarify that SUDS should be part of <u>any</u> proposed new development, and not just large developments.	Change Paragraph 18.47 to read: <i>18.47 “For any proposed Within larger development schemes such measures can complement site control SuDS techniques. .. “</i>	
93.	Sustainable Buildings Policy CC4	n/a	3.Effective ECC note the approach to sustainable buildings including the management of waste arising from construction on site.	None	

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94.	Paragraph 19.61 p182	n/a	3.Effective Change is required for clarification. This is to clearly reflect the most up to date position regarding the air quality along the A127.	CPBC to work with ECC to provide a more up to date position statement regarding Air Quality on the A127.	
95.	Chapter 21 Monitoring and Review Table 21.1 local Plan Monitoring Framework p192	n/a	3.Effective Change is required for clarification. Objective 5 should be strengthened to place greater focus on sustainable transport infrastructure and Electric Vehicle infrastructure. For example, including charging points (for example add to policy HO1). Rail and Station Travel Plans is also of relevance for inclusion.	CPBC to consider additional monitoring indicators for sustainable transport infrastructure and EV charging.	