

Our Ref: RJC/EFDC/OTCNP(1)  
Date: 18 March 2021  
Phone: 07775 008049  
Email: [rich.cooke@essex.gov.uk](mailto:rich.cooke@essex.gov.uk)

Mr M Letch - Parish Clerk  
Ongar Town Council

By email: [np@ongartowncouncil.gov.uk](mailto:np@ongartowncouncil.gov.uk)

Dear Mr Letch

**Re: Ongar Neighbourhood Plan (NP) (Regulation 14) March 2021 consultation**

Thank you for consulting Essex County Council (ECC) on this draft Neighbourhood Plan (NP). ECC provides the following response, which reflects ECC's role as the Minerals and Waste Planning Authority, the Highways Authority, the Local Education Authority and Lead Local Flood Authority. ECC is also responsible at the local level for public health. The ECC response provides information to assist in reviewing the Plan ahead of the Regulation 16 consultation, outlines where changes need to be made to ensure ECC can deliver its statutory responsibilities and recommends other changes for your consideration.

ECC is a key infrastructure provider and delivers and commissions a wide range of strategic and local infrastructure and public services, covering but not limited to highways and transportation, education, early years and childcare, minerals, waste, surface water management, passenger transport, adult social care, and Public Health. The impacts of growth from the allocation of development sites in neighbourhood plans (over and above those identified in a Local Plan) will need to be assessed, including infrastructure requirements, any mitigation, and how they will be funded and delivered.

**Essex County Council's Neighbourhood Planning Guide (September 2019)**

This information Guide explains the main County Council services that may need to be considered when carrying out neighbourhood planning. It also provides weblinks to relevant ECC policy guidance.

This Guide provides the following information on each theme:

- The relevant service or function within ECC and their responsibilities
- Relevance to neighbourhood planning
- The key documents produced by ECC to be considered when a Neighbourhood Plan is being prepared, and weblinks to those documents.

<https://www.essex.gov.uk/planning-advice-guidance/neighbourhood-planning-advice>

## **Requirements of Neighbourhood Plans and Links to emerging Epping Forest Local Plan (2011-2033)**

The National Planning Policy Framework (NPPF) 2019 makes it clear that *‘the NPPF must be taken into account in preparing the development plan’*. The NPPF also states (at paragraph 13) that:

The application of the presumption has implications for the way communities engage in neighbourhood planning. Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies.’

Conformity of the Ongar NP with the strategic policies of the EFDC Local Plan is primarily a matter for EFDC to consider and assess in detail. However, ECC has some important observations on this point, which will be outlined in the thematic comments section later in this response.

### Section 1.1 – Introduction (alternatively – Policies section at 5.4)

This section does not yet set out a full description of the overall Development Plan for the area covered by this NP (i.e. those elements of it beyond reference to the strategic policies of the EFDC Local Plan). On this, ECC is the Minerals and Waste Planning Authority for the area covered by the Plan. ECC would suggest reference to the adopted Essex Minerals Local Plan (MLP) (2014) and the Essex and Southend-on Sea Waste Local Plan (WLP) (2017) as being part of the formal Development Plan for Epping Forest District in paragraph 1.1. When determining a planning application, decision makers must also consider the policies within these two plans, as relevant. The emerging Ongar Neighbourhood Plan must also demonstrate conformity with these two documents.

Although Neighbourhood Plans should not seek to establish policy for minerals and waste land uses, they should include context on such matters, as relevant to the area. It is recommended that such recognition is given to the adopted MLP and WLP as part of paragraph 1.1 or further supporting paragraphs. Some areas of the Plan Area lie within a Minerals Safeguarding Area (MSA) and should be referenced in the planning context section.

The following additional text is recommended and has been incorporated into many other neighbourhood plans in Essex:

These plans set out the policy framework within which minerals and waste planning applications are assessed. They also contain policies which safeguard known mineral bearing land from sterilisation, and existing, permitted and allocated mineral and waste infrastructure from proximal development which may compromise their operation.

### Essex and Southend-on-Sea Waste Local Plan (WLP)

Essex County Council is the Waste Planning Authority (WPA) for the Plan area, and is responsible for preparing planning policies and assessing applications for waste

management development. The WLP was adopted in July 2017 forming part of the statutory Development Plan and should be read alongside the adopted Maldon Local Development Plan. The WLP covers the period from 2017 to 2032. It sets out where and how waste management developments can occur, and contains the policies against which waste management planning applications are assessed. Policy 2 of the WLP designates Waste Consultation Areas within 250m of active, allocated or permitted waste management facilities (400m in the case of Water Recycling Centres). These act to ensure that ECC are consulted on all non-waste related development proposals to ensure that there are no detrimental impacts which would compromise the operation of the existing facility or the newly proposed development.

#### Waste Consultation Area

Please note that Map 2 shows that areas in the south of the Neighbourhood Plan Area are covered by a Waste Consultation Area. Please refer to Appendix 1 for suggested text on this matter for inclusion within the NP.

#### Essex Minerals Local Plan 2014 (MLP)

The Essex Minerals Local Plan 2014 (MLP) forms part of the statutory Development Plan and should be read alongside the Epping Forest District Local Plan. Sand and gravel deposits are subject to a Minerals Safeguarding policy (Policy S8), which seeks to prevent deposits being sterilised by on mineral development.

Mineral Consultation Areas are also established through Policy S8 and these act to ensure that ECC are consulted on all non-mineral related development within a distance of 250m around active, allocated and permitted quarries, and other mineral infrastructure.

#### Mineral Resources in the Plan Area

Please note that Map 1 (see Appendix 2) shows that areas in the South and West of the Neighbourhood Plan Area are covered by a Minerals Safeguarding Area designation. Proposals for non-minerals development coming forward in land designated as a Mineral Safeguarding Area must demonstrate compliance with Policy S8 of the Essex Minerals Local Plan 2014. Please refer to Appendix 1 for suggested text on this matter for inclusion within the NP.

## **Rural Regeneration**

### Policy ONG-RR2 Chipping Ongar High Street

In principle ECC could support the potential redevelopment of surface car parks for uses supporting the vitality of the High Street centre, but the caveat to this requiring provision of equivalent or better (which might be interpreted to mean 'more') parking within the development or nearby is not supported, given the need to reduce traffic impacts.

Policy ONG-RR3 New Housing Mix and Standards – 'Interpretation' supporting text  
This states 'Car parking Standards must comply with Essex Design Guide and Essex Parking Standards based on national standards, but more generous provision would be expected due to the lack of employment locally and reliance on cars.'  
ECC would not support this proposal of increased car parking provision in principle without a clear and compelling justification. The approach as set out could be expected to perpetuate and exacerbate existing problems of dependence on the unsustainable use of private motor vehicles.

### Policy ONG-ED4: Sustainable Design

Policy ONG-ED4 which addresses sustainable design should support the wider understanding and promotion of good design requiring that development proposals refer to the sustainable planning of building materials.

Accordingly, it is recommended that the Policy is amended to include reference to promoting waste reduction, re-use and recycling, sustainable building design and the use of sustainable materials, including in relation to their procurement, in the construction of new development or redevelopment.

In terms of new developments, it needs to be made clear that the laying out and initial maintenance and management of infrastructure including open space, play areas, green infrastructure, allotments, is the responsibility of the developer, who will be required to demonstrate that satisfactory provision for indefinite future maintenance has been made. In order to address this, The plan should consider including wording such as:

*“Developers will be required to produce a management and maintenance plan for infrastructure that includes the community facilities and green infrastructure they have implemented.”*

### Paragraph 7.5

ECC notes this refers to reliance of Ongar residents on private transport and prevalence of 2, 3 or 4+ cars per household being higher than England average. ECC notes that this is used as basis to require that car parking spaces be designed into layouts from the outset (and mainly off-street). This relates to the part of Policy ONG-ED4 that refers to ensuring car park spaces ... are included early in design stage.

### Suggested new policy (relating to elements of existing Policies ONG-ED4 and ONG-ED5)

In the interests of setting out a comprehensive local policy approach towards key environmental / sustainability issues ECC would suggest that a separate policy is created for flood management and climate change.

Neighbourhood planning provides an opportunity for communities to think about and plan for their long-term resilience, whether this is about water stress, heat stress, energy efficiency and/or flooding. Although flood risk is mentioned in Policy ONG-ED4 (Sustainable Design) overall, the plan does not include any considerations for flood mitigation or other measures to adapt and mitigate from a changing climate that would have an impact on the sustainability, resilience and integrity of the Neighbourhood area.

It is suggested that the subject matter for this might include:

- Mitigating climate change:
  - renewable energy,
  - energy efficiency,
  - sustainable transport,
- Adapting to climate change:
  - Flooding,
  - extreme weather,
  - Green infrastructure & biodiversity

A separate policy could provide the detail to help manage the risk from flooding preferably through natural / sustainable methods, such as through open space design innovation that helps manage and store water, and by promoting the use of sustainable urban drainage systems. This will also provide multi-functional benefit such as assisting with species migration building biodiversity resilience and to provide shading during higher temperatures.

Consideration for Green Infrastructure planning can help the local community protect itself from the effects of climate change, whether through river restoration, wetland creation and tree planting. These improvements will reduce flood risk to homes, create high quality habitat for wildlife, improve air quality and provide an education and recreation resource. The planned improvements will also help to cool the air and provide clean water and shade.

The Essex Flood and Water Management team have worked on delivering successful natural flood management techniques from rain gardens in Basildon hospital to leaky dams in Thaxted watercourse in Uttlesford and the Kingsmoor area of Harlow. Please refer to the Essex SuDS Design Guide on this matter - <https://www.essexdesignguide.co.uk/suds>. For other helpful examples of SuDS schemes visit here: [www.ciria.com/suds/case\\_studies.htm](http://www.ciria.com/suds/case_studies.htm) , such as Lamb Drove development, South Cambridgeshire which successfully showcased SUDS as a viable and attractive alternative to more conventional piped drainage systems. The SuDS measures included: water butts; permeable paving; a green roof; swales; detention basins; filter strips; and a retention pond. The scheme has reduced the impact of development on flood risk, improved water quality, enhanced landscape and improved biodiversity and ecology.

#### Policy ONG-ED5: Environment

It is considered positive that biodiversity has been referred to in the NP. Through the 25-year environment plan, Natural England is reviewing existing green infrastructure (GI) standards and Green Planning Principles to set a national GI standards framework and the emerging Environment Bill aims to embed an environmental net gains requirement into developments, including housing, as mandatory. The first approach the Bill proposes

to achieve Environmental net gain, is biodiversity net gain, however the NP should ideally look beyond to the ambition for broader environmental net gain. This approach allows for wider natural capital benefits to be delivered by developments, such as flood protection, recreation, and improved water and air quality. The new [National Planning Practice Guidance](#) keeps green infrastructure at the forefront of its approach to delivering net gains for the environment. All developments should demonstrate the environmental net gains, and where there is a net loss from the development to secure provision through offsetting.

A new set of standards has been developed by Building with Nature to overcome the perceived and actual complexity of delivering high quality green infrastructure and has won a RTPI Award for Research Excellence. Drawing from evidence and good practice on all aspects of green infrastructure – wellbeing, water and wildlife, the standard defines high quality green infrastructure at each stage of the development process, from planning and design, through to long-term management and maintenance. It provides a framework of quality standards, an assessment and accreditation service, and national awards. By providing an accreditation at the plan/design stage, Building with Nature also starts to raise confidence in the planning and development sector that can achieve a collective understanding of why green infrastructure matters, and how to deliver it more consistently to accelerate the delivery of new homes and new places.

The Building with Nature Standards have been developed by practitioners and policy makers, academic experts and end-users, and has been tried and tested in multiple schemes from Cornwall to Scotland and is endorsed by Natural England, who is reviewing the current national green infrastructure standards.

<https://www.buildingwithnature.org.uk/about>

It is recommended that any proposed development applies the standards and achieves accreditation to highlight what good looks like at each stage of the green infrastructure lifecycle to help strengthen the development and demonstrate that the development goes beyond the statutory minima, to create places that deliver effectively for people and wildlife.

Furthermore, Place Services (attached to ECC) has published an Essex Biodiversity Validation Checklist, which is regularly updated in light of user feedback and changes to biodiversity legislation and policy, such as the introduction of British Standard 42020:2013: Biodiversity Code of practice for planning and development.

<https://www.placeservices.co.uk/what-we-do/natural-environment/ecology/planning-and-regulation/>

#### Policy ONG-CT1: Local Green Space

The NP states the importance of existing open spaces for Ongar. However, there need to be arrangements for the long-term management and maintenance documented and agreed. This could be achieved by developing a neighbourhood level maintenance plan and biodiversity plan that incorporates existing and new open and green spaces. A good example of this is the plans produced by West Bergholt Parish.

In order to address this, The policy wording could be amended to include the following:

“The following spaces are designated as Local Green Space *and will be protected, managed, maintained and improved to promote regular use and community enjoyment.*”

#### Paragraph 8.4 (Rationale: Transport and Movement)

ECC notes the reference within this that:

'Suggestions for engaging with Essex County Council relating to possible improvements to public transport is considered as an Action in the accompanying Appendix - Actions and Projects accompanying Ongar Neighbourhood Plan, but would require considerable continued subsidies due to the parish's low population.'

ECC notes this suggestion regarding bus subsidies. However, an approach that favours and would not seek to consider any potential to address private vehicle use is inherently unsustainable. As a result, it is suggested that this matter requires further consideration and exploration, with a viewing to assessing feasibility of all options with regard to the future transport patterns for the parish area and areas beyond.

#### Policy ONG-CT3: Transport and Movement

ECC considers that this policy is well drafted, wide ranging and generally reasonable for a rural parish area. However, importantly, it omits any mention of public transport, which needs addressing.

#### Policy ONG-CT5: Footpaths and Cycle Route

ECC supports this policy and notes that it includes protection of proposed new cycleway footpath but a plan does not appear to have been included in the consultation documents.

This part of the ECC response focusses on thematic matters and may span several parts, subjects or policies of the NP.

#### Green Infrastructure - General

ECC notes that a number of the Neighbourhood Plan (NP) policies contribute directly and indirectly to the GI network. These include:

- ONG-ED3 Sustainable Design
- ONG-ED4 Natural Environment
- ONG-ED5 Environment
- ONG-ED6 Landscape Buffers
- ONG-CT4 Infrastructure Priorities
- ONG-CT5 Footpaths and Cycle Routes

Although these policies are welcomed, along with the positive use of objectives to protect and enhance Ongars' heritage and natural assets, the use of Green infrastructure (GI) terminology is minimal. Therefore, ECC would recommend that a further green infrastructure/natural environment policy is included in the NP.

Green Infrastructure is a network of multi-functional high-quality green spaces and other environmental features, (such as footpaths, street trees) which together delivers multiple environmental, social and economic benefits. Through contributing to the quality and distinctiveness of the local environment, providing opportunities for physical activity, improving health and wellbeing and generally adding to quality of life. Therefore, planning for green spaces needs to be considered as an integral part of the wider planning for the area and taken in a holistic approach.

Although the Plan has policies that can be recognised as falling under the GI principles and themes, there is an opportunity to have a policy that encompasses GI as a whole and recognises the value of wider multi-functional GI for both people and wildlife. An opportunity to identify GI deficiencies, which can be addressed through planning, such as improved connectivity to existing and new green spaces and types of green facilities in need (e.g. play parks, Sustainable Urban Drainage), as well as the provision of new open space as part of the new development. It also gives scope for any developments to contribute to improvements to a green space based on community need.

The NP also makes no reference to the Essex Green Infrastructure Strategy (EGIS) (2020). The EGIS aims to enhance the urban and rural environment, through creating connected multi-functional GI that delivers multiple benefits to people and wildlife. The strategy has achieved Building with Nature Accreditation as a national exemplar and meets the Council's aspirations to improve GI and green spaces in towns, cities and villages, especially close to areas of deprivation. This can be viewed here: <https://www.placeservices.co.uk/resources/built-environment/essex-gi-strategy/>. Please refer to Appendix 1 for suggested new policy text on this matter for inclusion within the NP.

### Renewable Energy

It is noted that the NP does not address this matter. On this, the NPPF states that it recognises all communities have a responsibility “to contribute to energy generation from renewable or low carbon sources” and supports community-led initiatives.

This plan does not mention its stance on renewable energy for domestic and commercial developments, such as wind turbines, battery pods and community renewable heat initiative. Consideration might be given as to whether domestic solar panels would be the only renewable technology the local community would support. There is much more to be explored and many different ways in which a community can benefit from renewable energy.

Smart energy tools and storage devices (battery pods) are beginning to emerge which help to manage energy within the home and within the local network to make better use of the energy we produce and use. These tools have potential to reduce the amount of energy used in homes or businesses and reduce fuel bills.

A separate renewable policy would be a positive way of communicating the communities' position on renewable energy and the type of technologies that could be considered. The Neighbourhood Plan policies can provide and add detail to the policy on renewables within the EFDC Local Plan (Policy DM 20). Please refer to Appendix 1 for suggested policy content / wording.

### Electric vehicles

It is suggested that the Parish Council should consider the provision for and promotion of electric vehicles through the NP, including a provision policy for electric vehicles (in line with adopted vehicle parking standards and/or the Essex Design Guide<sup>1</sup>). The

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<sup>1</sup> Essex Design Guide [www.essexdesignguide.co.uk](http://www.essexdesignguide.co.uk)



Essex Design Guide states the follow: “For housing developments with garages and/or dedicated off-street parking, each new dwelling should be fitted with a standard (3-7kW) charge point. For housing developments with no off-street parking, 10% of the unallocated parking bays should have an active charge point. A further 10% should have the necessary underlying infrastructure (passive) to enable quick, simple installation at a later date when there is sufficient demand.”

Active spaces are fully wired and connected, ready to use, EV charging points at parking spaces. While passive provision requires the necessary underlying infrastructure wiring (e.g. the capacity in the connection to the local electricity network and electricity distribution board, as well as cabling to parking spaces) to enable simple installation and activation of a charge point at a later date.

The installation of wiring (installed at the same time as the general wiring for any new dwelling e.g. utilities) can provide provision for external EV charging facilities. This will not only help to mitigate potential air pollution from the growth of cars, but will represent a measure of “future proofing” to meet the growing demand. Since Government is committed to ban the sale of new diesel and petrol vehicles from 2040 in UK a few car manufacturers have already announced they will only produce electric vehicles from 2019/20 onwards, such as Volvo and Jaguar/Land Rover. Currently just over 2% of all new car sales are either plug-in hybrid vehicles or pure electric vehicles. This figure is expected to be around 10% by 2025. The industry anticipates that by 2025 it will be cheaper to buy an EV than an internal combustion engine vehicle so at that point even without Government subsidies the share of EVs will continue to rise.

### Transport, Sustainability and Climate Change

As Highways Authority for the district (and parish area) ECC has reviewed the transport content and policies including Policy ONG-CT3 (Transport and Movement). In response, ECC advises that sections of the NP support and propose what appears to be a relatively high local car parking requirement for new homes (above prevailing adopted ECC car parking standards (from September 2009)<sup>2</sup>. ECC notes that the proposed standards do not fully reflect the Policy DM8 Vehicle Parking Standards of the ECC Development Management Policies document (February 2011)<sup>3</sup> applies these standards, stating that the highways authority will ensure that development proposals comply with ECC’s current adopted car parking standards. By way of balance, ECC recognises that the area covered by the NP is partly rural in nature and has a relatively low population level and density and sustainable transport options are currently likely to be relatively limited.

It is recommended that the approach of the NP on these matters for the local area needs to take into account all relevant considerations, including the need for accessibility and local environmental factors but also important sustainability objectives. However, it is important that ECC highlights the following key considerations in this matter:

- The golden thread of sustainable development running through the NPPF 2019

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<sup>2</sup> See: [https://www.essex.gov.uk/Environment%20Planning/Development-in-Essex/Documents/Parking\\_Standards.pdf](https://www.essex.gov.uk/Environment%20Planning/Development-in-Essex/Documents/Parking_Standards.pdf) - see page 63

<sup>3</sup> See: [https://www.essex.gov.uk/Environment%20Planning/Development-in-Essex/Documents/Development\\_Management\\_Policies.pdf](https://www.essex.gov.uk/Environment%20Planning/Development-in-Essex/Documents/Development_Management_Policies.pdf) - see page 10

- Current proposed policy changes by the Government to the NPPF, which are likely to strengthen and re-emphasise the role of the planning system and Plans in delivering sustainable development
- [Essex Climate Action Commission](#) has been established to develop an effective response to climate change through a programme of ambitious actions across the county
- Epping Forest District Council [has declared a climate emergency](#) for the district, including of course (but not limited to) Ongar parish. This seeks to achieve a carbon neutral position by 2030. This is incompatible with a 'business as usual' approach based on unsustainable transport patterns
- The need for conformity with strategic policies of the EFDC Local Plan, including Policy T 1 Sustainable Transport Choices
- The proposed NP aims include:
  - Aim 3: Ensuring development is sustainable, well-designed and creates a distinctive local identity
  - Aim 5. Creating more sustainable live/work patterns
- In light of these aims, the NP needs to be consistent and its policies, approach and actions need to help deliver these identified aims
- Section 5.3 of the NP - Sustainable Development states that 'The policies of the NP seek to ensure the viability *and sustainability* of our diverse rural town.'
- Numerous parts of the NP refer to the issue of air quality. Vehicular traffic and unrestricted fossil fuel car use is a major cause of poor air quality and detracts from local quality of life
- Section 8.4 of the NP recognises that 'Particulate matter pollution (PM2.5) is also expected to be high adding to health concerns of residents.'

All these considerations form a compelling and cogent case that the NP needs to reconsider its approach towards Transport, Sustainability and Climate Change. Without this the NP will fail to address any local level progress in tackling climate change. The NP needs to consider carefully its vision and aims of the place that the Plan seeks to shape for the future, including the health and wellbeing of its residents, their quality of life and the local and wider environments. On this the NP points out that (for several reasons) residents have become car dependent but the NP would serve to perpetuate or exacerbate this issue by facilitating current or increased car use. Accordingly, ECC cannot support this important part of the NP as it currently stands.

In response, ECC recommends that this issue is reviewed and reconsidered afresh for the NP both strategically and in detail. The Ongar Neighbourhood Plan Community Group and Town Council have an opportunity to look beyond the parish towards concerted approaches and actions with other partners (such as other Parish / Town Councils). Co-ordinated work with EFDC and ECC will also be necessary. Feasibility work on scope / options for sustainable transport and a sustainable transport strategy will be necessary. The latter will also serve to address important issues around the health and integrity of the Epping Forest Special Area of Conservation (SAC).

### **Concluding Comments**

It is hoped that the overall approach and content of this response is recognised as seeking to be as positive as possible in shaping and improving the NP. In particular, the themes of ECC's input aim to ensure the NP is in conformity with the overall Development Plan, consistent in itself and promotes / delivers sustainable development.

Given the above content and considerations, there is much in the NP that ECC can support / to which ECC does not raise an objection. However, it is considered imperative to review and reconsider the content and approach towards the related issues of transport, sustainability and climate change.

If you wish to discuss any of the above matters in further detail please contact me via the contact details provided above.

Yours sincerely,

Rich Cooke  
Principal Spatial Planner, Planning Service

Planning Service, Economic Growth and Localities  
Essex County Council  
County Hall  
Market Road  
CHELMSFORD  
CM1 1QH

## Appendix 1

The Minerals and Waste Planning Authority expects appropriate reference to be made to the MLP and WLP as part of the description of the Development Plan in the Neighbourhood Plan's introduction. Suggested wording is as follows:

“Essex County Council is the Minerals and Waste Authority for the Neighbourhood Plan Area and is responsible for the production of mineral and waste local plans. The Development Plan in Ongar therefore also comprises of the Essex Minerals Local Plan 2014 (MLP) and the Essex and Southend-on-Sea Waste Local Plan 2017 (WLP). These plans set out the policy framework within which minerals and waste planning applications are assessed. They also contain policies which safeguard known mineral bearing land from sterilisation, and existing, permitted and allocated mineral and waste infrastructure from proximal development which may compromise their operation.

### Mineral Resources in the Plan Area

In light of the fact that only some areas of the Neighbourhood Plan Area are within a Minerals Safeguarding Area, the following wording could be added to the planning context section:

“Some areas of the Neighbourhood Plan Area in the South and West are within a Mineral Safeguarding Area due to the presence of sand and gravel deposits beneath the ground. These areas are subject to a mineral safeguarding policy (Policy S8 of the MLP), which seeks to prevent deposits being unnecessarily sterilised by non-mineral development. However, all housing allocations proposed in the Neighbourhood Plan are located outside of Mineral Safeguarding Areas and therefore there are no mineral safeguarding considerations.”

### Waste Consultation Area

In light of the fact that part of the Neighbourhood Plan Area is within a Waste Consultation Area, the following wording could be added to the planning context section:

“Some areas of the Neighbourhood Plan Area in the South are within a Waste Consultation Area due to the location of the Waste Transfer Station and the Aggregate Recycling Centre.

Where applications of a nature not specifically excluded by Policy 2 of the WLP are submitted for determination by Epping Forest District Council, the MWPA is required to be a consultee. The MWPA will likely object to applications until it is satisfied that the development will not cause operational constraints on the existing waste management facility.”

### Green Infrastructure – suggested policy wording

ECC suggests that an over-arching GI policy could read similarly to that below:

#### **Policy XX: Green infrastructure and development**

Proposals that will be encouraged are those that seek to enhance the green infrastructure of the parish, demonstrating how they:

- Protect and enhance existing green spaces and/or create new green/open spaces where appropriate.
- Improve the connectivity between wildlife areas and green spaces through green corridors and/or improvements to the Public, Rights of Way, and cycle and footpath networks.
- Enhance the landscape and visual characteristics of green spaces in close proximity to development through biodiversity/environment net gain.
- Ensure development landscape schemes, layouts, access and public open space provision and other amenity requirements contribute to the connectivity, maintenance and improvement of the GI Network.
- Meet the ANGSt standards<sup>4</sup> and what they can do to address any local deficiency in provision of green space.
- Take into consideration the principles of Sustainable Urban Drainage (SUDs) and natural flood management techniques, which will enhance biodiversity and ecosystems.
- Consider the multi-functional use and benefits of local green spaces as part of the GI network.
- Development proposals located outside of settlement boundaries, or adjacent to settlement boundaries, will be required to demonstrate through the use of green infrastructure where possible how they will maintain clear separation and avoid any potential coalescence between settlements within the Parish and adjoining Parishes.

## Renewable Energy

Suggested policy content / wording:

### **Policy XX: Renewable Energy**

The Neighbourhood Plan wishes to encourage community led renewable energy schemes and will support community-based groups working with local energy users in seeking funding to establish the technical, financial and legal feasibility of appropriate schemes within the neighbourhood area.

Proposals for community owned or led renewable energy schemes (including micro-hydro, photovoltaic or bio-mass projects) will be supported subject to the following criteria for the proposed development:

- The siting and scale are appropriate to its setting and position in the wider landscape;

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<sup>4</sup> Natural England's ANGSt Standard guide:

[http://webarchive.nationalarchives.gov.uk/20140605111422/http://www.naturalengland.org.uk/regions/east\\_of\\_england/ourwork/gi/accessiblenaturalgreenspacestandardangst.aspx](http://webarchive.nationalarchives.gov.uk/20140605111422/http://www.naturalengland.org.uk/regions/east_of_england/ourwork/gi/accessiblenaturalgreenspacestandardangst.aspx). Or

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/357411/Review8\\_Green\\_spaces\\_health\\_inequalities.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/357411/Review8_Green_spaces_health_inequalities.pdf)

Analysis of Accessible Natural Greenspace Provision for Essex, including Southend-on-Sea and Thurrock Unitary Authorities" -

[http://www.essexbiodiversity.org.uk/app/webroot/files/PDF\\_files/EWT\\_ANGSt\\_document.pdf](http://www.essexbiodiversity.org.uk/app/webroot/files/PDF_files/EWT_ANGSt_document.pdf)

- It does not give rise to unacceptable landscape or visual impact, either in isolation or cumulatively with other development;
- It does not create an unacceptable impact on the amenities of local residents;
- It does not have an unacceptable impact on a feature of natural or biodiversity importance

Useful documents and guidance –

- Low Carbon Neighbourhood Planning guidebook updated January 2018 produced by the Centre for Sustainable Energy  
<https://www.cse.org.uk/downloads/reports-and-publications/policy/community-energy/energy-advice/planning/renewables/low-carbon-neighbourhood-planning-guidebook.pdf>
- Planning practice guidance for renewable and low carbon energy – Department of communities and Local Government -  
[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/225689/Planning\\_Practice\\_Guidance\\_for\\_Renewable\\_and\\_Low\\_Carbon\\_Energy.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/225689/Planning_Practice_Guidance_for_Renewable_and_Low_Carbon_Energy.pdf)

## **General Comment included for Information Only**

### **Minerals**

Policy S8 of the MLP defines Mineral Safeguarding Areas (MSA) to ensure that important, finite resources are not needlessly sterilised by non-mineral development. As can be seen from Map 1 below, the plan area pertaining to the Ongar Neighbourhood Plan contains land designated as an MSA for sand and gravel. Where applications of a nature not specifically excluded by Policy S8, and which equate to 5ha or more within an MSA for sand and gravel, are submitted for determination by Epping Forest Council, the MWPA are required to be a consultee. The MWPA will likely object to applications which would result in the unnecessary sterilisation of mineral resources.

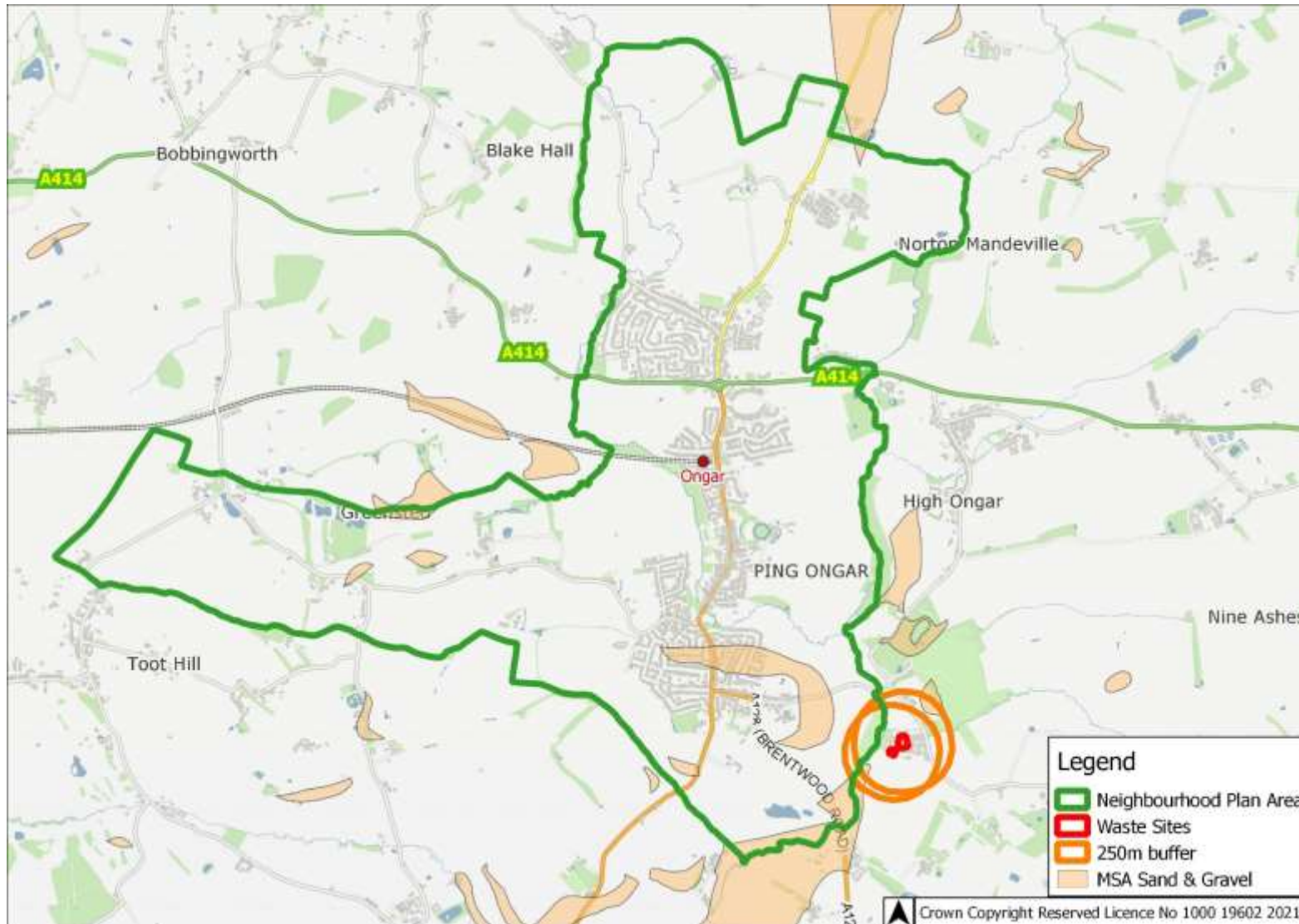
### **Waste**

Policy 2 of the WLP seeks to ensure that existing and allocated waste sites and infrastructure are protected from inappropriate neighbouring developments that may prejudice their continuing efficient operation. Policy 2 defines Waste Consultation Areas as extending up to 250m from waste management facilities (extending up to 400m for Water Recycling Centres). There are two waste sites which have associated Waste Consultation Areas which fall within the Neighbourhood Plan area, Lunnon Plant & Waste Services and P H Keen Ltd. Where applications of a nature not specifically excluded by Policy 2 are submitted for determination by Epping Forest District Council, the MWPA are required to be a consultee. The MWPA will likely object to applications unless it is satisfied that the development will not cause operational constraints on the existing waste management facility or there is an overriding justification as set out in Policy 2 of the WLP. It is noted that this site is not within the Neighbourhood Plan area itself, but this issue is raised given references to the site in the Neighbourhood Plan.

Please note that MSAs and WCAs are not intended to be a barrier to all potential future development, rather they seek to ensure that the Minerals and Waste Planning Authority are consulted on non-minerals and non-waste development that could adversely impact on the operation of a safeguarded mineral or waste site, or associated infrastructure. They also ensure that potential future development is not adversely affected by existing or future mineral and waste developments.

## Appendix 2

### Map 1 – Mineral Safeguarding and Waste Consultation Area within Ongar





Map 2 – Waste Sites and Waste Consultation Area within Ongar

