

Michael Letch
Epping Forest District Council
Forward Planning
323 High Street
Epping
Essex
CM16 4BZ

Our ref: NE/2014/121176/OR-04/PO1-L01
Your ref: Ongar Regulation 14 consultation
Date: 22 February 2021

Dear Michael,

Ongar Town Council Regulation 14 consultation

Thank you for consulting us on the Regulation 14 Draft Neighbourhood Plan for Ongar.

We aim to reduce flood risk and protect and enhance the water environment. We have identified that the neighbourhood plan area will be affected by the following environmental constraints:

1. Flood risk

The Neighbourhood Plan proposes site allocations within areas of flood zone 2 and 3 within the neighbourhood plan area, specifically to the West of Shelley and following the Cripsey Brook through Chipping Ongar. The Local Authority's Strategic Flood Risk Assessment and Surface Water Management Plans forms the evidence base to determine the level of flood risk in this area.

2. Main River water quality

The Cripsey Brook watercourse (Water Framework Directive ID: GB106037033481) runs through the neighbourhood plan area. This watercourse is currently failing to reach good ecological status/potential under the Water Framework Directive because of urban and agricultural diffuse and point-source and also physical modification of the river. It is currently classified as having moderate status.

The Upper Roding watercourse (Water Framework Directive ID: GB106037033500) also runs through the neighbourhood plan area. This watercourse is currently failing to reach good ecological status/potential under the Water Framework Directive because of urban and agricultural diffuse and point-source and also physical modification of the river. It is currently classified as having moderate status.

Developments within or adjacent to these watercourses should not cause further deterioration and should seek to improve the water quality based on the recommendations of the Thames River Basin Management Plan. An assessment of the potential impacts of the neighbourhood plan on this watercourse under WFD should be included within the SEA appraisal. Further information on the current status of this watercourse can be found on Catchment Data Explorer here:
<https://environment.data.gov.uk/catchment-planning/>

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3. Aquifers

Your plan includes areas which are located on Secondary A Bedrock and Superficial Aquifers. These should be considered within your plan if growth or development is proposed here. The relevance of the designation and the potential implication upon development proposals should be considered with reference to our Groundwater Protection guidance: <https://www.gov.uk/government/collections/groundwater-protection>

4. Contaminated land on aquifer

Your plan area includes historical landfill sites located on aquifers. If considering the redevelopment of this land, we recommend that developers:

- Follow the risk management framework provided in CLR11, Model Procedures for the Management of Land Contamination, when dealing with land affected by contamination.
- Refer to the Environment Agency Guiding Principles for Land Contamination for the type of information that we require in order to assess risks to controlled waters from the site. The Local Authority can advise on risk to other receptors, such as human health.
- Refer to the Thames River Basin Management Plan.
- Refer to our website at www.gov.uk/environment-agency for more information.

5. Wastewater infrastructure

If your plan proposes development or promotes growth we recommend early consultation with Thames Water to determine whether there is (or will be prior to occupation) sufficient infrastructure capacity existing for the connection, conveyance, treatment and disposal of quantity and quality of water associated with any proposed development within environmental limits of the receiving watercourse. This may impact on the housing figures and the phasing of development. Please note that if there is not sufficient capacity in the infrastructure then we must be consulted again with alternative methods of disposal.

We encourage you to seek ways in which your neighbourhood plan can improve the local environment.

6. Waste

The Neighbourhood Plan proposes sites that are in close proximity to/within 50 metres of a permitted waste site(s). We recommend that any housing sites are steered away from high risk waste disposal and treatment facilities to ensure the sites are not vulnerable to impacts of odour, noise, dust emissions, air pollution or traffic movements. The SEA appraisal and site selection methodology should include proximity.

General opportunities

Drawing up a neighbourhood plan is an opportunity to think about improving a local environment. General opportunities for neighbourhood planning include:

- New green spaces or improvements to public space through new development. This could include linking open spaces to make green corridors for people and wildlife, planting trees, or making improvements water quality and to local waterways.
- Recognising the value of certain environmental features within a plan to help bring forward environmental projects without development to help secure wider funding.

- Helping a community to manage the risk of flooding by providing landscaping to manage and store water, and by promoting the use of sustainable drainage systems (SuDS).
- It could also help to encourage energy and water efficiency measures for new builds. These measures will reduce the cost of construction for developers and help to reduce utility bills for those using the building. This will also help addressing the issue of unsustainable water consumption.

Final Comments

We encourage you to seek ways in which your neighbourhood plan can improve the local environment. For your information, together with Natural England, English Heritage and Forestry Commission we have published joint guidance on neighbourhood planning, which sets out sources of environmental information and ideas on incorporating the environment into plans. This is available at:

<https://neighbourhoodplanning.org/toolkits-and-guidance/consider-environment-neighbourhood-plans/>.

Should you have any queries regarding this response, please do not hesitate to contact me.

Yours sincerely,

George Lloyd
Planning Advisor

Number: +44 20302 54843

E-mail: HNL SustainablePlaces@environment-agency.gov.uk