

REGULATION 14 PRE-SUBMISSION CONSULTATION – STATUTORY CONSULTEE COMMENTS AND RESPONSES

ID	Rep. No	NBNP Policy	Para in NBNP	Comment	Noak Bridge PC Response	Change to Plan / Comment
Avison Young on behalf of National Grid Electricity Transmission	1.	General	N/A	Letter identifies no National Grid Assets within the NP area. Confirms that, at this present time, has no comments to make.	Noted	N/A
Environment Agency	2.	General	N/A	Confirms that, at this present time, has no comments to make.	Noted	N/A
Basildon Council	3.	Introduction	1.7.1 Pg 11	This Neighbourhood Plan has been produced to cover the period up to 2042, this is to align with Basildon Council's current Local Plan timetable and proposed plan period.	Noted	N/A
Basildon Council	4.	4.1 Vision and Objectives	4.2 – 4.2 Pg 32-34	The Vision and Objectives in the Noak Bridge Neighbourhood Plan Pre-Submission Draft aligns well with the emerging new Vision and Objectives set out within the Basildon Borough Issues and Options consultation. Both Vision's and sets of Objectives are seeking to deliver the types of development that are needed, encourage improved and sustainable transport options and protect and enhance key areas of the environment. The Council supports the approach Noak Bridge Parish Council have taken.	Support welcomed.	N/A
Basildon Council	5.	Basic Conditions and the NP Policies	1.4 Pg 8	<p>There are a total of 26 policies proposed in the Neighbourhood Plan and they cover the five thematic areas set out in the Objectives. The Neighbourhood Plan provides justifications for the proposed policies from its Evidence Base work.</p> <p>There are four policies relating to Housing, eight relating to Environment and Green Space, seven policies under Design and Conservation, five under Local Economy, Education, Health and Other Local Services and two under Transport and Roads. The policies proposed appear to meet with the basic conditions as set out above.</p>	Comments about meeting basic conditions welcomed.	N/A
Basildon Council	6.	3. Design and Conservation	4.2.1 Pg 33	How are DC 1 & 3 different?	<p>Objective 3 refers more to the Essex Design Guide-led design features that are found throughout the Plan area – these include fenestration and construction detailing etc.</p> <p>Objective 1 crosses over with objective 3 to some degree, but refers more to the layout and landscaped setting of the village and its overall appearance.</p> <p>If the examiner is concerned with this then they can</p>	No change.

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					recommend that they be combined.	
Basildon Council	7.	5. Transport and Roads	4.2.1 Pg 34	Transport & Roads should also mention 'support active travel'. Also in NB13 (page 82).	<p>The wording of the Vision and Objectives of the NP cannot be changed at this stage as the wording has been through a public consultation process. Making further changes at this stage would require re-consultation and that would delay the process unnecessarily.</p> <p>However the reference to active travel is helpful and will be incorporated in NP policy NB25 (as this deals with sustainable travel) rather than policy NB13 which deals with sustainable development and net zero carbon emissions.</p>	<p>Amend policy NB25 bullet point 4 to read:</p> <p><i>"Incorporate safe and convenient walking and cycling routes to local services from new residential developments which encourage active travel."</i></p>
Basildon Council	8.	NB1 Infill and Redevelopment to Provide New Housing	Pg 39	Add sustainable development.	It is not clear where the phrase 'sustainable development' should be added to the policy. This can be re-visited if it can be clarified.	No change.
Basildon Council	9.	NB12 Flooding and Drainage	Fig 34 Pg 78	Shows the old Critical Drainage Areas, this needs updating and further consideration – liaise with the Lead Local Flood Authority at Essex County Council	<p>Figure 34 shows the Sewer Flooding Map and doesn't refer to critical drainage areas. It is unclear what change is requested as a result. This can be re-visited if it can be clarified.</p> <p>See below for further comments from – and responses to – the LLFA regarding critical drainage areas.</p>	No change
Basildon Council	10.	NB13	Pg 82	Policy NB13 should also mention 'support active travel'.	See response to Basildon Council representation 7 above.	See response to representation 7.

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		Sustainable Development			Policy NB25 is to be amended rather than NB13.	
Basildon Council	11.	NB17 Designated and Non-Designated Heritage Assets (including the Conservation Area)	Pg 96	The Council has not yet produced its list of non-designated heritage assets so it may not be possible to encourage their protection at this stage of the NP.	<p>NPs can define non-designated heritage assets (NDHAs), provided that they are subject to an appropriate level of assessment to support their identification in this way.</p> <p>Where not already available, the assessments of the NDHAs will be provided as part of the background evidence to the submission version of the NP.</p>	Review assessment process for NDHAs in NP and ensure the assessment information is included in the background evidence supporting the NP at submission stage.
Basildon Council	12.	NB18 Re-Use of Rural Buildings	Pg 97	Include 'Noak Bridge' before 'Design Code' for clarity.	Accepted.	Amend policy NB18 to read: <i>“ The conversion of rural buildings should be informed by the <u>Noak Bridge Design Code.</u>”</i>
Basildon Council	13.	10. Transport and Roads	Pg 111-117	<p>Cycling Route 5 of the Local Cycling and Walking Infrastructure Plan goes through Noak Bridge, connecting Billericay School to Basildon Town Centre through Wash Road and Bridge Street, using the A127 overpass.</p> <p>Increased cycling, walking and wheeling can contribute to a reduction in private vehicle usage, reducing congestion and issues around parking. New developments should show how they are encouraging modal shift. Gear Change, a Department for Transport Strategy, outlined a vision for 50% of all journeys in urban areas to be made via walking or cycling by 2030. Encouraging active travel will also contribute to the Basildon Council Climate Change Strategy and the Active Environments Strategy.</p> <p>In order to increase the uptake of active travel then consideration should be given towards cycle parking at destinations, such as green spaces and local facilities. Consideration should also be given towards opportunities for linear play along key walking routes, helping to create a more engaging and fun walking experience for families.</p>	<p>Noted. A new sub-heading is proposed to cover Active Travel and the text in representation 13 will be incorporated into the new sub-section.</p> <p>This will complement the addition of the words 'Active Travel' in response to representation 7 above.</p>	<p>Add new sub-section to supporting text entitled 'Active Travel' in section 10 of the NP.</p> <p>Add the following text as three new paragraphs in the NP under the new sub-section heading:</p> <p><i>“Cycling Route 5 of the Local Cycling and Walking Infrastructure Plan goes through Noak Bridge, connecting Billericay School to Basildon Town Centre through Wash Road and Bridge Street, using the A127 overpass.</i></p> <p><i>Increased cycling, walking and wheeling can contribute to a reduction in private vehicle usage, reducing congestion and issues around parking. New</i></p>

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						<p><i>developments should show how they are encouraging modal shift. Gear Change, a Department for Transport Strategy, outlined a vision for 50% of all journeys in urban areas to be made via walking or cycling by 2030. Encouraging active travel will also contribute to the Basildon Council Climate Change Strategy and the Active Environments Strategy.</i></p> <p><i>In order to increase the uptake of active travel then consideration should be given towards cycle parking at destinations, such as green spaces and local facilities. Consideration should also be given towards opportunities for linear play along key walking routes, helping to create a more engaging and fun walking experience for families.”</i></p>
Basildon Council	14.	NB26 Parking	10.5.1-10.5.2 Pg 116-117	Whilst it is important to provide private vehicle parking, it is also necessary to provide adequate cycle parking, both for residents and for visitors. This is outlined in the Essex Design Guide as well as LTN1/20. LTN1/20 also advises that a minimum of 5% of cycle parking should be accessible for people with a disability/mobility impairment or adapted cycle, this aligns with expectations for the provision of disability car parking bays.	Noted. An amendment to policy NB26 could be included to cover this point about provision of cycle parking and to differentiate it from vehicle parking. Additional paragraph(s) will be required to support the policy in sub—section 10.5.	Amend NP policy NB26 to read: “ <i>Development proposals must make adequate provision for <u>vehicle and cycle</u> parking and access for deliveries, service vehicles, tradesmen working on-site and social visitors as well as for residents or workers. Development proposals must, whenever possible, provide adequate <u>vehicle and cycle</u> parking on-site and not rely on on-street parking. Development that</i>

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						<p><i>includes a reliance on <u>vehicle</u> parking on existing streets shall not be permitted where the streets are narrow, already heavily trafficked, have identified parking issues (see Figure 44), or where such on-street <u>vehicle</u> parking would impact on the safety of road users or adversely impact the character of the area."</i></p> <p>Amend supporting text at sub-section 10.5 to include additional text about cycle parking (with reference to the representation text).</p>
Basildon Council	15.	Design Code	N/A	Pavement parking is a major issue, reducing accessibility of streets and paths for the most vulnerable of path users, such as people pushing prams and people with mobility impairments. Many of the pictures show examples of pavement parking. Whilst there is a brief mention of issues around pavement parking, the Design Guide should make it clear that developments show how they are restricting pavement parking, through things like planting etc.	Accepted.	Highlighted further on page 30 Added illustration to page 31
Basildon Council	16.	Design Code	N/A	Add captions to photos, especially when specific, key building e.g. page 17. Also try and use real photos rather than google street view as some are quite distorted and the quality is low, also check for any image links that have dropped (e.g. page 54).	Accepted.	Updated p 17 and other images
Basildon Council	17.	Design Code	N/A	Thorough spelling and grammar check needed. Especially where this is inverting the meaning e.g. page 30 "On street parking should not dominate the street scene and be broken up with landscaping." Page 31 "On-street parking should dominate the street scene" Page 65 "...open countryside should be bounded by tall suburban fences".	Noted.	
Basildon Council	18.	Design Code	N/A	Carefully review the must/should against the could/mays. Other design codes have highlighted the 'must' and 'shoulds' in bold which helps to emphasise that these are essential points.	Accepted.	All design codes now amended with Could, Should and Must highlighted appropriately
Basildon Council	19.	Design Code	IH01.2 Pg 18	Unclear what 'tall frontage' refers to.	Accepted.	Removed from code
Basildon Council	20.	Design Code Context	Pg 21	Chart showing character areas the code refers to doesn't make sense, why are MS.01-05 only relevant to area 9 (open countryside recreation and equestrian)?	Accepted.	Amended to highlight

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Basildon Council	21.	Design Code Movement	Pg 23	What is yellow route? Add to key.	Accepted.	Key altered
Basildon Council	22.	Design Code Movement	Pg 25	Good that materials are mentioned but more should be made of this. Include some images, there are some really great examples from Noak Bridge of how materials can define different areas/thresholds (MS.02). Or make reference here to PS05 and expand that section.	Accepted.	Agreed – additional examples added
Basildon Council	23.	Design Code Movement	MS.04 Pg 26	Guidance on sight splays – agree these need to be limited in height but it is worth noting here that the solution isn't an absence of landscaping and planting, just appropriate selection and maintenance.	Accepted.	Amend as per ECC Comments below
Basildon Council	24.	Design Code Movement	Pg 28	Likewise, MS.06 visibility at junctions needed but street trees important too – correct planting spec and maintenance required.	Accepted.	Amend as per ECC Comments below
Basildon Council	25.	Design Code Movement	Pg 28	What is meant by 'shared cycle and footpaths'? Would these be on one level? The diagram shows a kerb between them?	Accepted.	Amended to clarify
Basildon Council	26.	Design Code Movement	Pg 28	Are 2m+ footpaths always required, even on very minor routes? The image shown (and many of the paths in the local area) are less than this. Balance needed between making accessible, safe routes and contextual, practical decisions that avoid unnecessary hard-surfacing.	Accepted.	Amended to clarify
Basildon Council	27.	Design Code Movement	Pg 28	Direct convenient routes important but also provide choice and variety.	Accepted.	Amended to clarify
Basildon Council	28.	Design Code Movement	Pg 29	Is MS.06.1 saying that garages should be included for houses, are just that if there are garages these should include cycle storage? Clarify.	Accepted.	Amended to clarify
Basildon Council	29.	Design Code Movement	Pg 31	Unclear about the top left diagram and the text, is this diagram showing good or bad practice? It does not seem to show the 2m deep front gardens mentioned in the text?	Accepted.	Amended to clarify good and bad practice
Basildon Council	30.	Design Code Movement	Pg 31	More needed with regards to the need for corner plots to be dual aspect. The walled-in parking is better than exposed but this suggestion does not support good design. Parking concealed between homes much better.	Accepted.	Amended diagrams
Basildon Council	31.	Design Code Movement	Pg 31	Rear courtyard/mews parking courts also need landscaping. (This is included in MS.07.1 but seems more relevant to MS.07).	Accepted.	Amended to clarify
Basildon Council	32.	Design Code Movement	Pg 33	MS.08 suggest new utilities are put into shared ducts.	Accepted.	Amended to clarify

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Basildon Council	33.	Design Code Nature	Pg 33-38	Increased biodiversity achieved with a variety of planting.	Accepted.	Amended to clarify
Basildon Council	34.	Design Code Nature	NB01.2 Pg 37	Developers must demonstrate green infrastructure around them but also on their site.	Accepted.	Amended to clarify
Basildon Council	35.	Design Code Nature	NB01.2 Pg 37	Mention the need for a variety of green spaces to be provided (see NDG 94 and NMDCG N.1.i) consider mentioning community gardens/growing spaces	Accepted.	Amended to clarify
Basildon Council	36.	Design Code Nature	Pg 37	Could reference the 3/30/300 rule here to give a quantifiable target. ¹	Accepted.	Target added
Basildon Council	37.	Design Code Nature	Pg 38	Trees also reduce temperature/urban heat island effect	Accepted.	Amended information
Basildon Council	38.	Design Code Nature	Pg 38	Rephrase NB01.3 to be more detailed, without repeating text - include the guidance in the policy note?	Accepted.	Amended to clarify
Basildon Council	39.	Design Code Nature	NB02.1 Pg 40	Add the need for a network of blue infrastructure that works alongside the green infrastructure (NB01.2).	Accepted.	Amended to clarify
Basildon Council	40.	Design Code Public Spaces	PS01 Pg 45	Add in reference to 'network of spaces integrated into green infrastructure and movement routes'.	Accepted.	Amended to clarify
Basildon Council	41.	Design Code Public Spaces	PS03 Pg 47	Clarify what 'nature opportunities at an appropriate level' refers to.	Accepted.	Amended to clarify
Basildon Council	42.	Design Code Public Spaces	PS03 Pg 47	What standards for new sports facilities are being referred to here?	Accepted.	Amended to clarify
Basildon Council	43.	Design Code Public Spaces	PS04 Pg 48	Consider adding in more quantifiable targets to aid implementation and enforcement, for example, WHO recommends seating every 50m.	Accepted.	Amended to clarify and targets added

¹ Promoting health and wellbeing through urban forests – Introducing the 3-30-300 rule | IUCN Urban Alliance, February 2021

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Basildon Council	44.	Design Code Public Spaces	Pg 49	The 'steps should be highlighted in a contrasting material' – review this sentence to clarify how much contrast is intended, while steps need to be safe this comment may result in designs going against the aspiration for 'limited, attractive, simple' materials e.g. the image bottom row, centre.	Accepted.	Amended to clarify
Basildon Council	45.	Design Code Public Spaces	Pg 51	Accessibility text seems very focused on one type (wheelchair), review content to make reference to a wider range of needs.	Accepted.	Amended to clarify
Basildon Council	46.	Design Code Identity	N/A	There is a lot of discussion of architectural design and materials but there are other aspects in the NDG that are suggested under this heading e.g. sense of place, legibility, streets, views, nature – ref to NDG for more detailed guidance.	Accepted.	Amended information
Basildon Council	47.	Design Code Identity	1.02 Pg 57	Add render to written list and recommend this is through-colour rather than painted for higher quality and longer-lasting facades.	Accepted.	Amended information
Basildon Council	48.	Design Code Identity	1.02 Pg 57	Consider incorporating more detail into the description of weatherboarding – many new developments propose cement-fibre/UPVC boarding rather than timber. While requiring less maintenance, these synthetic materials affect the quality and character of the facades.	Accepted.	Amended information
Basildon Council	49.	Design Code Identity	1.03 Pg 58	Add text in italics 'to achieve visually pleasing fenestration, windows on elevations should ...' ?	Accepted.	Amended information
Basildon Council	50.	Design Code Identity	1.04 Pg 59	Add a note regarding porches outside CA, that these should be contextually referenced and high-quality.	Accepted.	Amended information
Basildon Council	51.	Design Code Identity	Pg 60	Also more a general comment, it would be good if there were larger photos of the contextual examples, especially when illustrating details. Also recommend more captions – many photos will illustrate positive aspects but also negative ones, users of the code may extract what they want from the images unless clearly directed.	Accepted.	Captions added and further detail
Basildon Council	52.	Design Code Built Form	Pg 66-67	Add some photos of examples to complement diagrams (page 68 is more useful as a photo/diagram with a clear caption explaining what to look at).	Accepted.	Amended information
Basildon Council	53.	Design Code Built Form	BF.04 Pg 67	It may be beneficial to add more quantifiable guidance to aid implementation and enforcement e.g. what is considered a 'small' setback? What is the deepest permitted?	Accepted.	Amended information

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Basildon Council	54.	Design Code Built Form	BF.07 Pg 71	'New development should not obstruct long-distant views to the countryside beyond' – clarify this comment, what is meant by long-distance here? The following sentence seems to just say that a viewscape analysis is needed, which is logical.	Accepted.	Amended to clarify
Basildon Council	55.	Design Code Built Form	Pg 72-73	Try to avoid repeating text.	Accepted.	Reworded
Basildon Council	56.	Design Code Homes & Buildings	HO.01 Pg 76	Recommend adding 'functional built-in storage' as often plans comply but are impractical. May also be worth adding that built-in storage needs to account for space lost to M&E equipment such as ASHP cylinders (as R.01).	Accepted.	Amended to clarify
Basildon Council	57.	Design Code Homes & Buildings	Pg 77	Reword 'how not to present' to 'how to avoid'.	Accepted.	Amended to clarify
Basildon Council	58.	Design Code Homes & Buildings	HB.04 Pg 77	Reference should be HO.04?	Accepted.	Amended
Basildon Council	59.	Design Code Homes & Buildings	Pg 80	Large scale buildings should be...away from...key views" – assume this refers to key views on page 71 but be good to make this clear. Apartment buildings can be landmarks and are suitable in key views within the street/site.	Accepted.	Amended to clarify
Basildon Council	60.	Design Code Homes & Buildings	Pg 81	Passive design section needs more interrogation, this is a key subject and the current text is not thorough enough. For example, overheating is now more likely to be an issue than lack of solar gain, trees can certainly help but orientation and form are key. Also, daylighting and sunlight are indeed key – be aware that the BRE tests, while industry-standard, fail when it comes to open plan rooms. A kitchen at the far back of an open plan living room may be judged 'compliant' but will actually be dark. A good rule of thumb is that daylight will reach 6m from a window.	Accepted.	Amended information
Basildon Council	61.	Design Code Homes & Buildings	Pg 82	45 degree rule is usually more relevant to extensions/neighbours. This would mean forms such as those shown on page 72 would not be permitted, reconsider.	Accepted.	Amended to clarify
Basildon Council	62.	Design Code Homes & Buildings	HO.03 Pg 83	Privacy f., please clarify this point, does this only refer to roof windows overlooking neighbours garden areas?	Accepted.	Amended to clarify


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Basildon Council	63.	Design Code Homes & Buildings	HO.04.1 Pg 84	Front gardens I., add words in italics 'should have at least a minimal 1 metre personalisation strip'. Also recommend adding in a note about 'day one' planting – if planting is key to forming the boundary and privacy it needs to be reasonably mature from the outset.	Accepted.	Amended to clarify
Basildon Council	64.	Design Code Homes & Buildings	Pg 84	Concern that the sentence regarding issues with mature trees will result in trees being removed. Reconsider/omit this point. Trees can bring an incredible amount of value to gardens (privacy, biodiversity, seasonal delight).	Accepted.	Amended to clarify
Basildon Council	65.	Design Code Homes & Buildings	Pg 84/85	Reword titles for HO.04.1 & 2 as HO.04.1 does not discuss communal amenity space.	Accepted.	Amended to clarify
Basildon Council	66.	Design Code Homes & Buildings	Pg 86	Amend diagram with shed hedge.	Accepted.	Amended diagram
Basildon Council	67.	Design Code Homes & Buildings	HO.06 Pg 87	Communal refuse stores for apartments typically better when integrated into the building fabric, less impact on the street scene and likelihood of misuse.	Accepted.	Amended to clarify
Basildon Council	68.	Design Code Resources	N/A	This section seems a bit light, may be worth spending some further time on this.	Accepted.	Amended information
Basildon Council	69.	Design Code Resources	R.01 Pg 92	Do these notes relate to new development or retrofit? The first paragraph is at odds with some of the following text (e.g. replacement of windows).	Accepted.	Amended to clarify
Basildon Council	70.	Design Code Resources	Pg 93	Review the content on this page, the text needs more titles (not just SuDS discussed here) and more needed on SuDS in R.02. Note SuDS also help run-off.	Accepted.	Amended information
Basildon Council	71.	Design Code Design checklist	No.4 Pg 95	Change 'maximise' to 'optimise'	Accepted.	Amended to clarify

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Basildon Council	72.	Design Code Ten Characteristics not covered	N/A	<p>Lifespan – is there any content on lifespan, maintenance and stewardship? As a minimum, recommend some notes regarding the long-term maintenance plans for new, large developments as this has a big impact on the quality of public spaces and landscaping. Also recommend requesting that residents of large new developments should be issued an ‘education pack’, for example outlining the importance of the Nature Reserve and how to respect it.</p> <p>Uses – recommend a note regarding the need to create and support healthy, sustainable neighbourhoods that provide a mix of facilities and services.</p>	Accepted.	Amended information as previously missing
Basildon Council	73.	Character Appraisal	N/A	As a Design Code, avoid google streetview images which are distorted/low quality.	Noted.	At consultation stage, such images were due to be replaced by SG members and added as placeholders
Basildon Council	74.	Character Appraisal	Pg 19	Add the raised, landscaped pedestrian path off Crouch Street, this is a really unique and pleasant feature.	Accepted.	To be added
Basildon Council	75.	Character Appraisal	Pg 20, 26, 32, 39, 47, 54	Add key plan and/or captions to explain steetviews, why have these in particular been chosen? What is each one trying to say?	Accepted.	Amended information
Basildon Council	76.	Character Appraisal	Pg 53	Elaborate further on the character of this area, such as the river and the Nature Reserve.	Accepted.	Amended information
Brentwood Borough Council	77.	General	N/A	No response.	Noted	N/A
Coal Authority	78.	General		No response.	Noted	N/A
H R Philpot & Sons c/o Ceres Property	79.	Vision and Objectives	4.1.1 Pg 32	<p>The Landowner is broadly supportive of the proposed Vision at paragraph 4.1.1 of the draft NP. We do however consider there to be an opportunity to broaden the scope of the vision with regards to Green Belt and the development needs of the local community as set out within parts 1 and 2.</p> <p>Part 1 seeks to preserve the openness of the Green Belt which is consistent with the NPPF, however it makes no allowances for future Green Belt release through the NP as a mechanism for additional growth in the NP area, inferring that the NP will serve as a tool to support Green Belt release. Whilst it is for strategic policies to establish changes to Green Belt boundaries, detailed amendments to those boundaries may be made through non-strategic policies including neighbourhood plans (paragraph 140 of the NPPF).</p> <p>BBC are currently preparing a new Local Plan and whilst it is currently only at Regulation 18 stage, with the draft NP more advanced in the plan-making process, the emerging Local Plan may seek to release Green Belt land from within the NP area for allocation. The NP should therefore serve as a tool to influence the type of</p>	Noted. The wording of the Vision and Objectives of the NP cannot be changed at this stage as the wording has been through a public consultation process. Making further changes at this stage would require re-consultation and that would delay the process unnecessarily.	No change.

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				<p>development that may come forward in its NP area, and this should be reflected in its vision for Noak Bridge. For example, Land west of Barleylands Road and Land north of Wash Road could come forward through the Local Plan process and the NP's Vision should be to work positively with this process.</p> <p>Therefore Part 1 of the Vision should include flexible wording that acknowledges the potential for Green Belt release through the emerging Local Plan, and that the NP should help shape development consistent with the aspirations and needs of the local community.</p> <p>The Landowner supports the recognition that good quality housing should be provided but consider the Vision should make reference to the need to meet the full needs of the local community, including specialist housing and older persons housing consistent with paragraph 62 of the NPPF. Whilst the NP contains specific objectives on older persons housing (discussed below), it should be recognised in its Vision.</p>		
H R Philpot & Sons c/o Ceres Property	80.	Vision and Objectives	4.2 Pg 32-34	<p>The Landowner broadly supports all objectives, with particular support for objectives H2 and H3 which seeks to identify the housing needs of the local community and to promote specialist housing in order to support all members of the community. This is consistent with the NPPF.</p> <p>There again however should be recognition within the proposed objectives of Green Belt release through the emerging Local Plan and that the NP should seek to help influence and shape proposals for new development through this process. Additional wording to this effect could be added to EGS6</p>	Noted. The wording of the Vision and Objectives of the NP cannot be changed at this stage as the wording has been through a public consultation process. Making further changes at this stage would require re-consultation and that would delay the process unnecessarily.	No change.
H R Philpot & Sons c/o Ceres Property	81.	6. Housing	Pg 37-47	The Landowner broadly support policies NB1 – NB4, which primarily concern detailed development management policies for housing proposals	Noted, support welcomed.	No change.
H R Philpot & Sons c/o Ceres Property	82.	NB5 Green Belt	Pg 49	The Landowner acknowledges that this policy is consistent with the NPPF but again considers there to be an opportunity to expressly refer to potential allocations and Green Belt release through the emerging Local Plan, in addition to referring to policies within the development plan (current or future adopted)	This is a matter for the emerging Local Plan to address. There is no need or requirement to go further in policy NB5 than is currently set out in the policy.	No change.
H R Philpot & Sons c/o Ceres Property	83.	NB11 Important Views	Fig 28 Pg 71	<p>Upon review of the Character Appraisal, no important views are identified across the rural landscape north beyond the built settlement of Noak Bridge. The only important views identified in the character appraisal are within the Conservation Area shown in section 2.3 of the appraisal.</p> <p>We therefore query how the majority of the important views identified in Figure 28 have come to be, and whether any formal landscape assessment has been undertaken to inform these views. For example, view 14 (Ref: V14) on Figure 28 captures some of the Landowner's land west of Barleylands Road. The review of Character Area 9 within the character appraisal (Open Countryside, recreation and equestrian uses) only</p>	Character Area 9 (pages 53-54) of the Character Appraisal describes long range views over the area of open countryside to the east and north of the village. The document notes that the countryside in Character Area 9 is highly visible from the Public	Where necessary and for the purposes of clarity, Sections 7.7, figures 28 and 29 and policy NB11 will be reviewed to provide further information relating to the key views.

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				<p>refers to ‘<i>long ranging views</i>’ and provides a sample of photographs on page 54 which are not labelled and are unclear as to which parts of the character area they refer to. Page 55 provides greater context and assessment drawn from the Council’s Landscape Character Assessment (2014) and whilst it does provide commentary around the key characteristics, influences and features and does make reference to retaining ‘<i>key viewpoints and vistas to landscape from public roads and rights of way</i>’ there is again no explicit reference to specific key views to inform those set within Figure 28.</p> <p>Likewise the views identified in Figure 28 are also contained within the draft Design Code and are described as being identified either from the Conservation Area Appraisal or the Character Appraisal for the Neighbourhood Plan. They are also contained and referred to within the draft Code BF07 which seeks to ensure the following:</p> <p>We therefore query the robustness of the key views identified and the evidence base for their inclusion in the draft NP and supporting documents, as they may potentially have significant implications for new development and any land coming forward for release from the Green Belt. The draft NP must therefore make sure the inclusion of important views is based on sound and reliable evidence.</p> <p>We request that this policy is either removed, amended to remove the explicit views or is based upon further evidence undertaken prior to the submission of the draft NP for examination</p>	<p>Rights of Way network and local roads.</p> <p>Furthermore the 2014 Basildon Landscape Character Assessment defines the open landscape of the plan area as lying within LCA 9 – Upper Crouch Valley Farmlands. Within that LCA the key characteristics (reproduced at page 55 of the Character Appraisal) include:</p> <ul style="list-style-type: none"> • Panoramic views to north towards Wooded Hills and ridge • Views from Dunton Road and Wash Road to the north across the vegetated River Crouch valley and towards Little Burstead and Great Burstead <p>Views 28 and 29 of the 2014 Landscape Character Assessment clearly cross the land to the north of Noak Bridge:</p>  <p>Section 4.5 of the 2014 Assessment describes views 28 and 29 as follows:</p> <p><i>“Viewpoint 28; Dunton Road</i></p> <p><i>Panoramic views from along Dunton Road, looking north</i></p>	<p>Figures 28 and 29 will be checked for consistency and the section of the NP will be cross-checked against the Character Appraisal and Design Code for consistency as well.</p>

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					<p><i>east and north west over open arable fields towards the vegetated corridor of the River Crouch. Mary the Virgin Church in Little Burstead and the surrounding elevated sloping farmlands are features within the view. Electricity pylons are more prominent to the east of the view.</i></p> <p><i>Viewpoint 29; Wash Road</i></p> <p><i>View from roadside looking north west across arable fields towards Great Burstead. The steeple of St Mary Magdalene Church in Great Burstead can be seen above vegetation on the skyline. The recycling depot and Barleylands are features in the Upper Crouch Valley.”</i></p>	
H R Philpot & Sons c/o Ceres Property	84.	NB23 Community Facilities	Fig 43 Pg 108	<p>Policy NB23 identifies community facilities on Figure 43. Figure 43 denotes Land west of Barleylands Road as Forest Glade FC reference CF11. This is then represented as no. 8 in the Policy under Sports Clubs as an important local community facility.</p> <p>The Landowner wishes to emphasise that the land is just a field and whilst it accommodates playing pitches it should not strictly fall under the definition of ‘community facility’ for the purposes of draft Policy NB23 given the temporary and minimal infrastructure required to use the land as playing fields for football.</p> <p>Whilst the Landowner wishes to continue to work positively with the Parish Council and local community they also wish to safeguard their right to use their land at their discretion within appropriate planning and environmental controls without it being subject to strict policies within the Neighbourhood Plan, should they wish to pursue a change of use or cease the current use as playing fields.</p> <p>As such, the Landowner respectfully requests that their land is removed from Figure 43 in the draft NP, as well as the Parish Structure Map at 2.1 of the Noak Bridge Character Appraisal.</p>	<p>Many playing pitches are fields that are levelled and used for pitches. This does not mean that such uses care temporary, simply because of the lack of infrastructure. The same would apply to many pitches in parks around the country but they are not considered by the users to be temporary.</p> <p>Sport England has a statutory duty to protect playing fields and they exercise that duty frequently in relation to applications to redevelop such fields. Pitches such as those west of Barleylands Road are already protected as a matter of principle by virtue of the NPPF paragraphs 97c) and 103.</p>	No change.

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					<p>The pitches identified as community facility CF11 in the NP Appendix 3 are considered by the local community to be community facilities and they have supported their inclusion within the list of facilities in policy NB23 at point 8 and as shown on figure 43.</p> <p>Any alternative use(s) of those pitches would be subject to securing planning permission for the alternative use(s) a point that is recognised in the representation.</p>	
Essex Police – Designing out Crime Office (DOCO)	85.	2 Planning Policy Context	2.1.3 Pg 13	<p>We recognise that communities where safety and security has been addressed and 'designed in' at the earliest planning stages, will enhance the health and wellbeing of its resident's. Mitigating the opportunities for crime is not only about reducing and preventing injury but it is also about building strong, cohesive, vibrant, and participatory communities.</p> <p>Good design is crucial for housing longevity, however creating safe and secure homes incorporating the principles of Crime Prevention Through Environmental Design (CPTED) will also enhance the lifespan allowing homes to be designed for the future and not just for present day.</p> <p>The DOCO supports both the Levelling Up program and National Planning Policy which is about making sure residents have a safe community, good quality housing, education, community facilities and have the same opportunities and equality as others.</p> <p>Using the principles (and wherever possible accreditation) of Secured by Design (SBD) and incorporating CPTED principles can help support this program by creating safe and inclusive spaces, estates and housing provision that will not only be a 'home' but provide a safe and secure environment and encourage community cohesion.</p> <p>Childhood experiences can have a significant impact on how we grow and develop, both physical and mental health. ACE's (Adverse Childhood Experiences) relate to an event or events that happened in a child's life which has a negative impact upon their behaviour and journey through life.</p> <p>Academic research suggests living in an unsafe environment could be a potential cause to produce an ACE for a child. Safe places are not just about the home environment but similarly the built environments and community facilities. Therefore, the DOCO would advocate that secure mitigation measures should be applied and considered to create a healthy community</p>	Noted	No change.

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Essex Police – Designing out Crime Office (DOCO)	86.	2 Basildon Borough Local Plan	2.2 Pg 14-15	<p>Within the Basildon Local Plan, the application of ‘designing out crime and crime prevention’ is referenced throughout. An integrated approach to crime prevention during the earliest stages (as per Local Planning Policy BAS BE 24) recommends, that it is necessary to all significant components of its design, planning, and layout.</p> <p>“11.16: The prevention of crime is not only a matter for the police. Local Planning authorities can make a contribution when considering the design of new developments. The layout of new developments can discourage and prevent crime by encouraging surveillance, a sense of ownership of open areas, discourage vandalism and theft, and make unauthorised access to property more difficult.”</p> <p>Basildon Local Plan page 56, 11 Crime Prevention</p>	Noted	No change.
Essex Police – Designing out Crime Office (DOCO)	87.	Vision and Objectives	4.1 Pg 32	<p>Constructing well designed places, buildings and communities that promote both sustainable communities and health and wellbeing is an objective that the Essex Police DOCO widely supports; however, it is imperative that they must also be safe, secure, and accessible.</p> <p>Having a safe place to live with good community cohesion will have a positive effect on health whilst also building sustainable communities. Incorporating the principles of CPTED will enable for safer homes which residents will feel secure living in.</p> <p>To support the Vision of good quality homes within Noak Bridge, the Essex Police DOCO would advocate that all new development seeks to achieve SBD Homes accreditations</p>	Noted. The wording of the Vision and Objectives of the NP cannot be changed at this stage as the wording has been through a public consultation process. Making further changes at this stage would require re-consultation and that would delay the process unnecessarily.	No change.
Essex Police – Designing out Crime Office (DOCO)	88.	7.2 Landscape	Pg 50-53	<p>The DOCO welcomes the opportunity of enhancing the landscape and public realm spaces, however it is important that such spaces should be designed with residents’ and the community’s safety in mind, whilst making all areas inclusive for all.</p> <p>The DOCO would like to bring to your attention, the Home Office strategy of reducing ‘Violence Against Women and Girls’ (VAWG). The strategy aims to improve wellbeing and perception of crime for women and girls, thus ensuring their safety within their community. Therefore, it is recommended when designing new public realm and green spaces (inclusive of cycling, walking and play areas) that consideration should be given to environmental design so that women and girls feel included and comfortable using the spaces.</p> <p><i>“Women and girls often do not feel safe in parks and so use them less. This is not just because they fear crime, whether that’s rape, assault or harassment. They also feel uncomfortable, unwelcome and judged. Women are three times more likely than men to feel unsafe in parks during the day, and that gets worse after dark”.</i></p> <p><i>Safer Parks Improving access for woman and girls (Safer Parks Executive Summary (greenflagaward.org))</i></p> <p>The ‘Noak Bridge – Design Code’ References that proposals must contain appropriate information to demonstrate that safety and security have been considered within landscape design. The document promotes the SBD guidance which allows public realm users to feel safe when using open spaces.</p> <p><i>“Buildings and spaces should be accessible and welcoming to all users. Spaces which are safe and attractive will encourage users to spend more time in such locations and increase use and vitality”.</i></p>	<p>Noted. The section of the NP referred to deals with landscape character and the means by which effects on the landscape arising from development can be mitigated (see policy NB6).</p> <p>However reference to SBD principles will be introduced where feasible to do so in the NP including in policy NB15.</p> <p>The Design Code will be updated to refer to the Home Office Strategy and Safer Parks publications.</p>	<p>Amend policy NB15 to refer to Secured by Design principles as a new bullet point.</p> <p>Amend the Design Code to refer to the following matters in Code PS06:</p> <ul style="list-style-type: none"> • The Home Office strategy of reducing ‘Violence Against Women and Girls’ • Safer Parks Improving access for woman and girls (Safer Parks Executive Summary (greenflagaward.org))

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				<p><i>Design Code, CODE PS06 - Public Realm - Secured by Design page 50</i></p>		
<p>Essex Police – Designing out Crime Office (DOCO)</p>	<p>89.</p>	<p>NB13 Sustainable Development</p>	<p>Pg 82-83</p>	<p>Carbon Footprint: The DOCO recommends the use of SBD Policed Preferred Security Products (such as doors, windows, locks and cycle storage). Member companies / products have not only been tested to the relevant security standards but are also fully certified by an independent third-party certification, therefore proven to deter criminal activity and reduce crime.</p> <p>In addition, academic research suggests that they Police Preferred Products support sustainability agendas as they are proven to last longer (due to the robustness of the product), and therefore reduce the developments carbon footprint. Products will have a longer life span and minimal maintenance whilst supporting the sustainable homes vision and objectives of the Noak Bridge Neighbourhood Plan proposal.</p> <p>Health and Wellbeing: Embedding ‘Designing out Crime’ principles can evidence Sustainability Objectives and Health Impact Assessment requirements, as developments that have mitigated against potential crime can see increased community engagement.</p> <p>Electric Vehicle Charging Provision: Sustainable transport should be efficient, safe and have a low impact on the environment, however, new technology surrounding this agenda brings new types of criminal activity, for example, theft of core cabling.</p> <p>Specially in relation to providing EV charging capability, it is advised that crime prevention measures for such provision are implemented at the earliest stages to mitigate opportunities for crime.</p>	<p>Noted.</p>	<p>Modify Section 8.1 to refer to using Police-Preferred Security Products and the value of designing out crime for health and wellbeing.</p> <p>Add reference to Section 10.5 about the benefit of introducing crime prevention measures with EV charging installations to reduce cable theft etc.</p>
<p>Essex Police – Designing out Crime Office (DOCO)</p>	<p>90.</p>	<p>8.3 Design Principles</p>	<p>8.3.2 Pg 86</p>	<p>The DOCO would like to bring to your attention two additional themes / supplementary guidance contained within the Essex Design Guide that should also be considered.</p> <ul style="list-style-type: none"> • Women and Girls Safety in the Public Realm: It is crucial public spaces are designed with the safety of women and girls in mind, public spaces are sometimes avoided or never used by females’ users due to the poor design and fear of crime. • Engaging with the Emergency Services: The DOCO would encourage engagement with the emergency services, this will allow for roads and infrastructure to be designed with emergency vehicles in mind as well as understanding a crime profile of an area and how residents could be influenced before the design of new public spaces, housing, and commercial buildings. 	<p>Noted. The former point will be addressed (see response to representation 88 above).</p> <p>The latter point is helpful but as this Plan is not allocating land for the delivery of roads or infrastructure this is a matter that is more appropriately directed towards the Borough Council in their emerging Local Plan.</p>	

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Essex Police – Designing out Crime Office (DOCO)	91.	NB19 Dark skies policy	Pg 99-100	<p>Lighting plays a pivotal role in deterring criminal activity, but also promotes a feeling of safety within that space. When designing both public and private space, (and when applied and designed correctly), lighting can reduce the potential for crime.</p> <p>The DOCO recognises the requirement for a dark skies policy and believes lighting can be implemented with suitable mitigation measures to prevent light spill and pollution.</p>	Noted.	No change.
Essex Police – Designing out Crime Office (DOCO)	92.	NB23 Community Facilities	Pg 108-109	<p>The DOCO agrees community facilities play an important role within the community, however, proposals to build new facilities or refurbishment should be designed with crime in mind. Safe, secure, and inclusive facilities will have a positive effect on resident's health and wellbeing and encourages a sense of ownership.</p> <p>It is essential community facilities are used for their intended purpose and have a management and maintenance plan in place to ensure they do not encourage crime and anti-social behaviour.</p> <p>Please refer to previous comments in relation to perception of safety for Women and Girls.</p>	Noted. These points are either already being addressed (women & girls safety – see response to representation 88 above) or are matters that are more appropriate to secure in the emerging Basildon Local Plan or through negotiations concerning individual applications.	No change.
Essex Police – Designing out Crime Office (DOCO)	93.	Policy NB24 Funding new facilities/ infrastructure	Pg 111	<p>Residents have indicated that the current footpaths are in a poor state of repair and requires immediate action.</p> <p>Its advised pathways, new cycle and walking routes are designed to be well lit, straight, and as wide as possible maximising the opportunities for natural surveillance. Well-designed spaces will allow users to feel safe and secure while using the space throughout different times of day. Applying the methods of CPTED will support this policy</p>	Noted. Policy NB25 already covers pedestrian and cycling safety at bullet points 4 and 5. The specific issues mentioned are matters that should be raised in relation to specific planning applications and are too detailed for this level of policy.	No change.
Essex Police – Designing out Crime Office (DOCO)	94.	11 Community Aspirations	Pg 118-119	<p>Road Design and Layout: Consideration is requested to use the “Safe system approach” when designing local roads in and around the community. This will take into consideration the various road user groups who wish to access these roads. Essex Police would request that thought is given for the provision of Emergency Service Access throughout the village. It is essential that emergency vehicles can gain rapid access to any incident occurring within the village and surrounding neighborhoods.</p> <p>20mph speed limits: Many local authorities are introducing 20mph limits to reduce road risk, and encourage active travel, and improve air quality. Essex Police would recommend liaison with our Roads Policing colleagues regarding this matter. It is vital that any enforcement strategies (such as parking enforcement and low speed limits) are self-policing and enforceable. Emergency Services should not be overburdened to overcome inadequacies in safety management, access control or enforcement.</p> <p>Community Facilities:</p>	<p>Section 11 of the NP deals with community aspirations. They do not form part of the formal neighbourhood plan, because they are either pre-existing issues or they are non-land use issues.</p> <p>In both cases they are outside the scope of this Neighbourhood Plan and therefore no further changes will be made to address the first two points in this NP.</p> <p>The last point will be addressed in policy NB15 (see response to representation 88 above).</p>	No change.

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				The DOCO encourages the community aspirations to build new community facilities and housing for all, however, is recommended crime prevention is considered of in the very early stages of planning and design as referenced in the Basildon Local plan. Please see section 2.2 (Basildon Local Plan) for further details		
Essex County Council	95.	General	N/A	<p>Everyone's Essex Everyone's Essex (2021-2025), is the Council's organisation strategy, sets out a strategic aim for a strong, inclusive and sustainable economy. This strategic aim includes a commitment to deliver and maintain high quality infrastructure to support a growing economy and the delivery of new homes and communities. Achieving this requires us to ensure that the development, planning and infrastructure delivery across the administrative county, can be aligned and support the Local and Neighbourhood Plans that are being prepared across the county, at its borders and beyond. This is to ensure that the planned growth includes provision for the delivery of ECC's infrastructure and services commensurate with the growth being planned, and to support existing and future residents and businesses. The response reflects this aim.</p> <p>Essex County Council's Neighbourhood Planning Guide (2019) This document provides information on the services within ECC that may need to be considered when completing a Neighbourhood Plan and provides relevant weblinks to policy and guidance. Essex County Council's Neighbourhood Planning Guide can be found here.</p>	Noted.	Add references to these documents in the general evidence base where appropriate.
Essex County Council	96.	General	N/A	<p>The Noak Bridge Design Code provides more detailed guidance and has regard to wider evidence base, than that presented within the Neighbourhood Plan (The Plan). The Neighbourhood plan would benefit a review against the Design Code to ensure consistency between the documents.</p> <p>ECC recommend that the Neighbourhood Plan (The Plan) supporting text and policies are reviewed against and greater reference is made to the Noak Bridge Design Code (Design Code). This is to ensure consistency between the documents</p>	Noted	Review NP for consistency against the Noak Bridge Design Code as part of the preparatory work for submission of the NP document for examination.
Essex County Council	97.	General	N/A	<p>The Policy Justification Evidence Base, does not always include the documentation referred to either within the supporting text or the policy</p> <p>ECC recommend that these are reviewed and that the additional documentation is included within the Policy Justification Evidence Base for consistency and clarification</p>	Noted	Review the various evidence base lists against the relevant supporting text and policy for consistency purposes and make amendments where necessary.
Essex County Council	98.	1.5 Relationship with the Development Plan	1.5.6 – 1.5.7 Pg 10	<p>ECC, as the Minerals and Waste Planning Authority (MWPA) welcome the references to the Minerals and Waste Local Plans in section 2.3, however notes that paragraph 1.5.6 refers to only the Saved Polices of the Basildon District Local plan forming the current development plan. Paragraph 1.5.7 then goes on to state that "Once 'made" (ie approved following a referendum) this Neighbourhood Plan will also form a part of the development plan"</p> <p>The Development Plan for Noak Bridge also includes the Adopted Essex Minerals Local Plan (2014) (MLP) and the Essex and Southend on Sea Waste Local Plan (2017) (WLP) and some policies do apply to non-minerals and waste related developments within the parish. For clarity the role of the MWPA and the adopted MLP and WLP should be</p>	Noted	Add clarificatory text to the development plan section of the NP to refer to the Minerals and Waste policy documents.

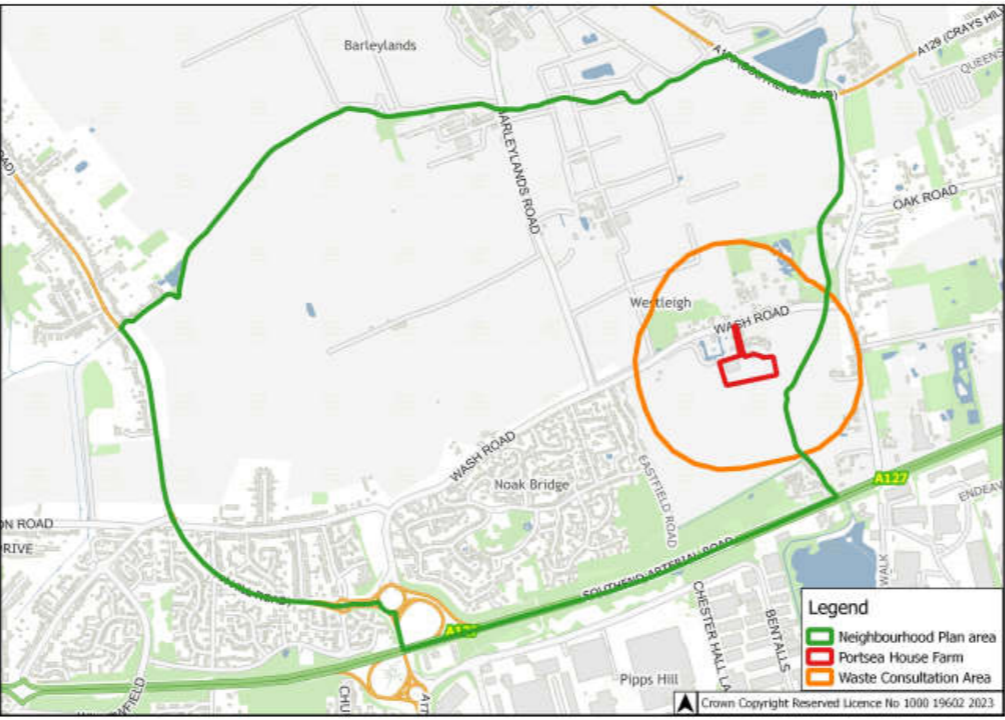
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				<p>explicitly recognised in a new paragraph and paragraph 1.5.6 should be amended to include reference to the MLP and WLP.</p> <p>Subject to the above changes to clearly recognise that the MLP & WLP form part of the current “Development Plan” it will not be necessary specifically name the MLP and WLP within paragraph 1.5.7</p> <p>ECC recommend a new paragraph is inserted before para 1.5.6 to read: <u>Essex County Council is the Minerals and Waste Planning Authority for the Plan area and is responsible for the production of mineral and waste local plans. The Development Plan in Noak Bridge therefore also comprises 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 seek to reduce mineral use and promote sustainable construction techniques; and to safeguard known mineral bearing land from sterilisation, and existing, permitted and allocated mineral and waste infrastructure from proximal development which may compromise their operation.”</u></p> <p>ECC recommend paragraph 1.5.6 is amended to read: - <u>The current development plan consists of the Saved Policies of the Basildon District Local plan, adopted in March 1998 (policies saved in September 2007), the Adopted Essex Minerals Local Plan (2014) (MLP) and the Essex and Southend-on-Sea Waste Local Plan (2017) (WLP), which collectively form the development plan. The Saved Policies These collectively represent the Development Plan and principal set of planning policies currently applied in the Plan Area. The Saved Policies represent the principal set of planning policies currently applied in the Plan Area”</u></p> <p>Subject to the above changes there is no need to amend paragraph 1.5.7</p>		
Essex County Council	99.	2. Planning Policy Context	2.1.3 Pg 13-14	<p>ECC appreciate the list of NPPF references is not exhaustive, however recommend it is expanded to include <u>Climate Change and Risk of Flooding (see section 8.2)</u></p> <p>ECC suggest the NPPF bullets are expanded to include: <u>Climate Change and Planning of Flooding Risk (paragraphs 152 - 169)</u></p>	Noted	Add reference to the climate change and flood risk section of the NPPF as suggested.
Essex County Council	100.	2. Planning Policy Context	2.3.1-2.3.5 Pg 15-16	<p>ECC, as the Minerals and Waste Planning Authority (MWPA), welcome this section on the MLP and WLP, and can provide the following updates:-</p> <p>A MLP Review has commenced to extend the plan period from 2029 to 2040. A ‘Call for Sites’ exercise ended in early November 2022 which invited additional sites to be submitted for consideration.</p> <p>The following is provided for information and context on minerals and waste issues and to ensure conformity with the MLP and WLP, which equally apply to non-minerals and waste related developments. Further comments and recommendations relate to section 8.1, policy NB13 and Design Code R.03 Construction & Materials to ensure conformity with MLP policy S4</p> <p><u>MLP</u></p>	<p>Noted. NPs are not allowed to cover minerals and waste matters within their policies and therefore for the avoidance of ambiguity it is not proposed to make specific reference to policies contained within the Minerals and Waste Local Plans which, by definition, cover County Matters.</p> <p>The Minerals and Waste Local Plan documents and key sections therein will however be</p>	Include reference to Minerals and Waste Local Plans and where they can be read, together with referencing of key sections.

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				<p>MLP Policy S4 Reducing the use of mineral resources - to promote sustainable construction techniques and sustainable use of minerals resources on site to reduce the levels of mineral waste, construction, demolition and excavation waste going to landfill, and this policy also applies to non-minerals and waste related developments.</p> <p>The Plan area includes a waste facility that is subject to a Waste Consultation Area (WCA) (See Appendix 1, Map 2 as set out in the Essex and Southend on Sea Waste Local Plan Policy 2. The policy refers to development proposals within the designated Waste Consultation Areas at a distance of 250m around safeguarded existing and allocated waste developments and 400m from Water Recycling Centres. Sensitive uses should not be located adjacent to, or within, 250 metres (or 400m of a Water Recycling Centres) of any part of a safeguarded site. However, the actual buffer needed around each site will depend upon the nature of the proposed 'sensitive' use and on the specific impacts of the current waste operation. Subject to the exemptions set out in the policy, a Waste Infrastructure Impact Assessment would be required to accompany any proposal within WCA's, to ensure the continued and future operation of the waste infrastructure would not be compromised.</p> <p>Proposals for non-waste related development coming forward on land designated as a WCA should demonstrate compliance with policy 2 and where appropriate be supported by a Waste Infrastructure Impact Assessment (WIIA). The scope of a WIIA should be agreed with ECC as the MWPA. ECC, as the MWPA, must be consulted on all applications for non-mineral and non-waste development proposed within this area that meet the tests set out in WLP Policy 2.</p> <p>The scope of a WIIA should be agreed with ECC as the MWPA. ECC, as the MWPA, must be consulted on all applications for non-mineral and non-waste development proposed within this area that meet the tests set out in WLP Policy 2.</p> <p>ECC recommend the following changes to paragraph 2.3.1 to read: -</p> <p><i>An important principle of Neighbourhood Planning is that Neighbourhood Plans are not allowed to cover what are generally known as 'County Matters', i.e. minerals and waste planning matters. This Neighbourhood Plan respects that requirement and therefore the Minerals and Waste Local Plan documents, whilst which forming a part of the development plan, and are also applicable to non-minerals and waste related developments and are not core to the policies of this Neighbourhood Plan and are discussed here and crossed referenced within the Neighbourhood Plan where applicable for completeness and to ensure conformity. only for the sake of completeness.</i></p> <p>Appendix 1 Minerals and Waste Planning Maps</p> <p>Map 1 – Waste Consultation Area – (Waste Local Plan policy 2)</p>	<p>signposted for readers to refer to should they wish.</p>	

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				 <p>There is one WCA within the Plan area, as listed below for which WLP policy2 applies.</p> <ul style="list-style-type: none"> • ESS/64/19/BAS Land at Portsea House Farm, Wash Road, Laindon, SS15 4AZ Lawful Development Certificate: Inert waste transfer facility and the importation, storage and processing of construction and demolition waste to produce soils, soil substitutes and aggregates 		
Essex County Council	101.	2. Planning Policy Context	2.4.1 Pg 16-17	<p>ECC can advise that the following are our Corporate Policies and Strategies</p> <ul style="list-style-type: none"> • Everyone's Essex (2021-2025) • Levelling Up Essex • Levelling-Up-Essex - One year on: Impact Report • Our Environmental Statement <p>Please note the relevant messages and recommendations from the above documents and the independent report by the Essex Climate Action Commissions (ECAC) entitled Net Zero: making Essex Carbon Neutral (July 2021) for which ECC is an advocate, and ECC's response to it is set out in Essex Climate Action Plan (November 2021) are informing updates to ECC plans, strategies and guidance.</p> <p>ECC recommend that the parish have regard to a raft of evidence and guidance prepared by the Essex Planning Officers' Association (EPOA) which informs design, planning processes and highlights the importance of quality,</p>	<p>Noted. References to these documents will be added to the general evidence base where appropriate.</p> <p>The Essex Design Guide is already referenced in both the Noak Bridge Character Appraisal and Design Code documents, as well as in NP policies NB2, NB15 and section 8.3.</p>	<p>Add references to key documents in general evidence base where appropriate.</p>

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				mostly contained within the Essex Design Guide (EDG) . This has been endorsed or adopted by Basildon Borough Council (BBC) .		
Essex County Council	102.	2. Planning Policy Context	2.4.2 Pg 17	<p>ECC can provide the following updates in relation to the South Essex JSP, which is now referred to as the South Essex Framework. It is being prepared by the South Essex Councils (formerly ASELA), comprising Basildon, BWD, CPT, CP, ROC, SCC, THU and Essex County Council.</p> <p>ECC Recommend paragraph 2.4.2 is updated to reflect the latest position in South Essex. ECC suggest the following</p> <p><i>2.4.2. Furthermore, local planning authorities of Basildon, Brentwood, Castle Point, Rochford, Southend-on-Sea; and Thurrock with Essex County Council through the South Essex Councils partnership have commenced the process of producing a South Essex Framework (SEF) Joint Strategic Plan (JSP)16.... At the time of writing work has stopped on this SEF strategic Plan-but may re-start in the near future.</i></p>	Noted. The text will be updated.	Update text to reflect recommended change to 2.4.2.
Essex County Council	103.	3. The Neighbourhood Plan Area	3.2.10 Pg 22	<p>ECC note that the housing and population data is based upon the 2017 South Essex Strategic Housing Market Area Assessment, which is now out of date and has been replaced by the South Essex Housing Needs Assessment, as referenced in Section 6.</p> <p>ECC recommend this section is updated to based upon the 2022 SHMA</p>	Noted. The text will be updated to reflect the more up to date 2022 Housing Needs Assessment, referenced in Section 6 of the NP.	Update 3.2.10 to reflect 2022 HNA.
Essex County Council	104.	3. The Neighbourhood Plan Area	3.2.12 Pg 23	<p>ECC as lead authority for Education, can advise that the Commissioning School Places in Essex (2017-2022) is an out-of-date document. The data alluded to is from the 2016/17 academic year. It showed eight surplus places at the school but, in any case, all seven primary cohorts in that count will now have left Noak Bridge Primary. It is noted that section 9.2 refers to the latest School Organisation Ten Year Plan January 2023.</p> <p>ECC can provide the following update: -</p> <p>As at the May 2023 census the Noak Bridge primary school was full in five of the seven year groups, with 77.6% of the pupils on roll living within the school's priority admissions area.</p>	Noted. The text will be updated for consistency and to reflect the latest information.	Update text in section 3.2.12 for consistency and to reflect the latest schools information.
Essex County Council	105.	3. The Neighbourhood Plan Area	3.2.11- 3.2.12 Pg 23	<p>ECC as lead authority for Education, can advise that the Commissioning School Places in Essex (2017-2022) is an out-of-date document. The data alluded to is from the 2016/17 academic year. It showed eight surplus places at the school but, in any case, all seven primary cohorts in that count will now have left Noak Bridge Primary. It is noted that section 9.2 refers to the latest School Organisation Ten Year Plan January 2023.</p> <p>ECC can provide the following update: -</p> <p>As at the May 2023 census the Noak Bridge primary school was full in five of the seven year groups, with 77.6% of the pupils on roll living within the school's priority admissions area.</p>	See above.	See above.

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Essex County Council	106.	3. The Neighbourhood Plan Area	3.2.31 Pg 30	<p>ECC as the Lead Local Flood Authority (LLFA) has supplied additional information in relation to Sections 4, 7.8, 8.1 and the NB Design Code which may assist updating this section. For example the LLFA can advise that there are no Critical Drainage Areas within the Plan area.</p> <p>ECC recommend the parish review and update this section with regard to the additional information supplied in section 4, 7.8, 8.1 and the NB Design Code</p>	See response to representation 118 (concerning section 7.8 of the NP) below.	See response to representation 118 (concerning section 7.8 of the NP) below.
Essex County Council	107.	3. The Neighbourhood Plan Area	3.2.34- 3.2.35 Pg 30	<p>ECC as Highways and Transportation Authority has supplied additional information in relation to Section 4, 8.1- 8.3, 10 and the NB Design Code which may be assist updating this section.</p> <p>ECC recommend the parish consider ECC's additional information and proposed changes supplied in section 4, 8.1- 8.3 and 10 and the NB Design Code in a review of this paragraph</p>	Noted. See below for response.	N/A
Essex County Council	108.	Vision and Objectives	4.1.1 Pg 32	<p>ECC recommend reference should be made to the 'setting' of heritage assets consistent with NPPF, paragraph 194 and Section 8 – Heritage Assets. ECC recommend reference is also made to multifunctional green infrastructure (GI) and net gain in biodiversity and promote low carbon transport options in the Vision given the nature of the Plan area outlined in Section 3.</p> <p>ECC also recommend the parish council consider a new overarching policy regarding GI be added to Section 7.5 (Green Infrastructure) which also relates to sections 7.3-7.6. The policy is provided below in this response.</p> <p>For your information, Natural England has published the National Green Infrastructure Framework (January 2023), which is designed to help meet requirements in the NPPF, paragraph 20d to develop strategic policies regarding GI in local plans and in new developments.</p> <p>The Framework comprises:</p> <ul style="list-style-type: none"> • Green Infrastructure Principles: provide a baseline to develop stronger GI policy and delivery; • Green Infrastructure Standards: guidance on national standards for GI quantity and quality; • Green Infrastructure Maps: mapped environmental, socio-economic datasets to support the standards; • Green Infrastructure Planning and Design Guide: practical, evidence-based advice on how to design good quality green infrastructure; and. • Green Infrastructure Process Journeys: guides on how to apply all the products in the GI Framework advise for Neighbourhood Plans. <p>ECC recommend the Plan makes reference to and applies the Essex Green Infrastructure Strategy (2020) and the Essex Green Infrastructure Standards (June 2022) as part of the Plan's evidence base, both of which have been endorsed by Natural England. These documents champion for the enhancement, protection, and creation of an inclusive and integrated network of green spaces. Applying Essex's nine GI principles will help to ensure quality and consistency in the provision, management, and stewardship of GI an essential part of place-making and place-keeping for the benefit of people and wildlife. ECC considers that all major and strategic development sites should be designed around green and blue infrastructure to inform and shape the development. Particularly within denser developments, GI and open space should be approached from a multifunctional perspective, combining uses such as sustainable drainage, public open space, walking and cycling routes and biodiversity conservation to combine functional uses with amenity benefits.</p>	<p>Noted. The wording of the Vision and Objectives of the NP cannot be changed at this stage as the wording has been through a public consultation process. Making further changes at this stage would require re-consultation and that would delay the process unnecessarily.</p> <p>In response to the other issues raised (which are also raised elsewhere in the representations by the County Council) please refer to the responses to those issues and in particular to the requested amendments / additions concerning a new Green Infrastructure policy; BNG and other matters.</p> <p>In relation to BNG, Planning Practice Guidance is clear in advising:</p> <p><i>"Plan-makers should be aware of the statutory framework for biodiversity net gain, but they do not need to include policies which duplicate the detailed</i></p>	No change.

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				<p>These features should be strategically located to provide green infrastructure and landscaping in prominent spaces to maximise the benefits to site users and increase the usability of multifunctional space.</p> <p>ECC recommend the Plan makes more reference to securing net gain in biodiversity. All development is required to deliver a minimum of 10% biodiversity net gain (BNG) consistent with the Environment Act 2021. The mandatory requirement for BNG was expected to come into place in November 2023, however this has been delayed to enable the necessary systems to be in place. Small sites (9 or more homes) will need to comply with the Act from April 2024. The Government's response to the 2018 consultation on BNG set out that there would be a 2-year implementation period for mandatory BNG once the Environment Bill received Royal Assent and became the Act (which happened on 9 November 2021).</p> <p>A Greater Essex Local Nature Partnership (GELNP) was established in March 2022 to deliver the outputs of the DEFRA 2023 Environmental Improvement Plan, the 25-Year Environment Plan, and Environment Act (2021). This includes the preparation of the Greater Essex Local Nature Recovery Strategy (GELNRS), including delivering BNG, multifunctional green infrastructure and sustainable land management and to contribute to the national tree planting target. The GELNRS will form the baseline for habitat information, which in turn will generate action to promote biodiversity management and improvement. The GELNRS is being prepared for completion by early 2024. The GELNRS is being prepared for completion by early 2024. An Essex Biodiversity Net Gain (BNG) Guidance Pack has been produced and provides an overview of the facts and guidance on BNG to date. DEFRA released the first round of LNRS guidance on the 23rd of March 2023, which covers general principles of what the LNRS will include. DEFRA also released the LNRS regulations, which layout the legal requirements placed on the Responsible Authority when delivering an LNRS.</p> <p>ECC as the Lead Local Flood Authority is also an active partner in the GELNP and GELNRS.</p> <p>ECC supports the requirement for net gain to preferably be on-site and if this is not achievable off-site with deliverability needing to be evidenced. ECC/Local Nature Partnership (LNP) is presently investigating the approach of seeking developers who cannot deliver the necessary biodiversity requirements on site, due to site constraints, the opportunity to purchase biodiversity credits that can be used to provide additional biodiversity benefits to specific locations on ECC land. A statutory biodiversity credits scheme, in accordance with the Act, is being established through developing a biodiversity credit investment pipeline and payment structures to fund habitat provision. It is anticipated more information on the national biodiversity credits scheme to be made available in Winter 2023. Any net gain provision will need to demonstrate long term management/stewardship for at least 30 years via obligations/ conservation covenant.</p> <p>The Essex LNP Biodiversity and Planning Working Group are exploring the feasibility for 20% BNG. Once more evidence on delivery and viability is available the Plan may wish to consider adopting a higher figure than the minimum 10% requirement. An Essex BNG Guidance Pack has been produced and provides an overview of the facts and guidance on BNG to date.</p> <p>ECC recommend the parish council uses the Essex Biodiversity Validation Checklist with regards ecological and biological records. This is a good starting point for the parish to commence data collection regarding local biodiversity. In addition, the parish may wish to contact Essex Wildlife Trust who are running a 'Wilder Towns Wilder Villages Project' to help parish and town councils with regards training and resources, connecting with other councils and promoting good practice. Parish Councils are required to sign up to receive a 'toolkit'.</p> <p>ECC recommend the following changes to the vision</p>	<p><i>provisions of this statutory framework...</i>"</p> <p>Paragraph: 006 Reference ID: 74-006-20240214</p> <p>The statutory framework includes the Town & Country Planning Act 1990 Schedule 7A Part 1 Section 2(3) which secures a 10% net gain, and therefore the suggestion to repeat the need to deliver a net gain in biodiversity at various points throughout the NP is considered to be superfluous.</p> <p>References to increasing BNG above 10% are more properly matters for the emerging Local Plan rather than this NP.</p> <p>Finally in relation to heritage setting, this is already covered in policies NB2, NB15 and NB17. It is not necessary to rewrite the Vision to include reference to the setting of heritage assets as well. The Vision is a short, broad statement of intent and is not intended to cover every single principle enshrined in the NP policies.</p>	

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ID	Rep. No	NBNP Policy	Para in NBNP	Comment	Noak Bridge PC Response	Change to Plan / Comment
				<p>1) <i>To preserve and enhance the special character and appearance of Noak Bridge, maintaining the openness of the Green Belt that surrounds the settlement whilst protecting important views, the natural environment and green spaces <u>multifunctional green infrastructure, net gain in biodiversity, wildlife are safeguarded and enhanced throughout the Plan Area.</u></i></p> <p>2) <i>To ensure that new development will meet the needs of the local community in delivering sustainable low energy and <u>net zero</u> low carbon, good quality appropriate housing and employment as well as improving existing community, health, education and retail facilities.</i></p> <p>3) <i>To increase highway safety and <u>promote low carbon transport alternatives including active and sustainable travel options including improved public transport services and improved parking provision</u></i></p> <p>ECC recommend the parish update and review section 7.2-7.6, having regard to this additional information and guidance. See also ECC's recommendations to Section 7.3 Biodiversity Policy NB7 and Design Code NB02.2, R0.2, R.03</p>		
Essex County Council	109.	Vision and Objectives	4.2.1 Pg 33	<p>ECC recommend the a number of objectives are amended to reflect the recommended changes to the Vision and the supporting information regarding multifunctional green infrastructure and net gain in biodiversity, SuDs and Transport.</p> <ul style="list-style-type: none"> <i>To protect and respect the landscape, <u>multifunctional green infrastructure, wildlife and countryside of the Parish, and cherish its natural environment and provide net gain in biodiversity.</u></i> <p>3. Conserve & enhance natural environment by reducing noise, water, air and traffic pollution <u>and promoting low carbon alternatives</u></p> <p>ECC has recommended an amendment to the Vison (see above) regarding multifunctional GI and BNG. Consequently, ECC recommend an overarching policy be inserted into the Plan in Section 7, in particular 7.3-7.6 concerning multifunctional Green Infrastructure which could be drafted from the template below.</p> <p><u><i>NEW POLICY: Green Infrastructure</i></u></p> <p><i>A Green Infrastructure network of multi-functional high-quality green spaces and other environmental features (such as footpaths, street trees, play parks and village green) should be developed across the neighbourhood which together delivers multiple environmental, social and economic benefits, by:</i></p> <ul style="list-style-type: none"> <i>contributing to the quality and distinctiveness of the local environment and landscape character,</i> <i>be designed to deliver Biodiversity Net Gain and wider environmental net gains, that forms an important component of nature recovery networks and the wider landscape scale GI network.</i> <i>ensuring opportunities for community socialisation to promote community cohesion and increase community safety,</i> <i>creating a green wedge and buffer,</i> <i>providing opportunities for physical activity, improving health and wellbeing and generally adding to quality of life,</i> 	<p>Policy NB9 already covers the green and infrastructure networks and was endorsed by the local community as addressing their requirements for these topic areas.</p> <p>As a consequence the new policy is not considered necessary, nor the changes to the objectives that flow from the comments.</p> <p>Planning Practice Guidance is clear in advising:</p> <p><i>"Plan-makers should be aware of the statutory framework for biodiversity net gain, but they do not need to include policies which duplicate the detailed provisions of this statutory framework..."</i></p> <p>Paragraph: 006 Reference ID: 74-006-20240214</p> <p>The statutory framework includes the Town & Country Planning Act 1990 Schedule 7A Part 1 Section 2(3) which</p>	No change.

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				<ul style="list-style-type: none"> • <i>adapting and mitigating against a changing climate and severe weather through the management and enhancement of existing habitats and the creation of new ones to assist with species migration, to provide shade during higher temperatures, reduce air pollution and for flood mitigation, and</i> • <i>encouraging a modal shift from car to walking and cycling by linking publicly accessible green space wherever possible (including through tree lined streets) to form walking and cycling routes.</i> <p><i>Development will be required, where appropriate, to contribute towards the delivery of new green and blue infrastructure which develops and enhances a network of multi-functional spaces and natural features.</i></p> <p>ECC recommend considering merge a number of objectives and suggest</p> <ul style="list-style-type: none"> • <i>To protect and respect the landscape, <u>multifunctional green infrastructure</u>, wildlife and countryside of the Parish, and cherish its natural environment <u>and provide net gain in biodiversity.</u></i> <p>Amend EGS₃) to read</p> <p><i>Conserve & enhance natural environment by reducing noise, water, air and traffic pollution <u>and promoting low carbon transport alternatives</u></i></p> <p>Expand section 7.3-7.6 having regard to the information supplied and suggested GI policy set out under Section 4 vision and in relation to the objectives..</p>	<p>secures a 10% net gain, and therefore the suggestion to repeat the need to deliver a net gain in biodiversity at various points throughout the NP is considered to be superfluous.</p> <p>Finally, the wording of the Vision and Objectives of the NP cannot be changed at this stage as the wording has been through a public consultation process. Making further changes at this stage would require re-consultation and that would delay the process unnecessarily.</p>	
Essex County Council	110.	Vision and Objectives	4.2.1 Pg 33-34	<p>Objective EHS4 Parents have a right to express a preference for any primary school. During the annual admissions round, school places are offered on the basis of 'admissions criteria' set by each school. Whilst schools often prioritise local children, either living in an area or by distance, un-filled places cannot be reserved.</p> <p>Objective EHS5 School place planning is conducted on the basis of groups agreed annually with the DfE as part of their School Capacity Survey. Any new housing in the area could be considered as increasing pressure on schools within the group. As drafted this objective could preclude any new homes suitable for families with school age children.</p> <p>Amend wording of objective EHS4 to avoid inferring places can be kept for local pupils.</p> <p>Amend wording of Objective EHS5 to ensure development is not precluded but mitigates its impact on the availability of school places within the local School Place Planning Group, for example:-</p> <p><i>EHS5) To ensure developments plan <u>for and fully mitigates their impacts</u> avoid any expansion pressure on the existing school and ensure that development provides any necessary additional educational facilities</i></p> <p><i>independent of the existing primary school</i></p>	<p>The wording of the Vision and Objectives of the NP cannot be changed at this stage as the wording has been through a public consultation process. Making further changes at this stage would require re-consultation and that would delay the process unnecessarily.</p>	No change.

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Essex County Council	111.	Vision and Objectives	4.2.1 Pg 34	<p>ECC suggest the objective should be positive toward the existing community facilities, having regard to the vision and policies in the Plan</p> <p>ECC suggest the objective is re-worded as follows: <i>EHS6) To protect <u>and enhance</u> existing community facilities</i></p>	The wording of the Vision and Objectives of the NP cannot be changed at this stage as the wording has been through a public consultation process. Making further changes at this stage would require re-consultation and that would delay the process unnecessarily.	No change.
Essex County Council	112.	Vision and Objectives	4.2.1 Pg 34	<p>ECC as highway and transportation Authority recommend note that the Strategic Objectives reflect the priorities in Section 3, however recommend the parish consider an overarching transport objective in relation to wider place making objectives of Sustainable Development, Climate Change and Housing, and Education. From which the existing objectives could be reviewed/consolidated and re-ordered (for example merge TR1&2?).</p> <p>This could have regard to the additional transport evidence, guidance and policy and strategy information supplied, as set out in section 8.1-8.3 and 10, and the NB Design Codes which has regard to this evidence; and for conformity with the NPPF promoting sustainable transport and nation transport policy.</p> <p>Within this context ECC also suggest the parish consider the 3 new Transport & Roads Objectives: to support a more rounded and contemporary Vision,</p> <p>ECC recommend the Parish consider an overarching Transport objective to be more rounded based on ECC's additional comments and the NP polices n relation to Section 8.1-8.3 and 10. Within this context ECC suggest consideration is given to these 3 additional objectives</p> <p><u>TR6 To promote low carbon transport alternatives including active and sustainable travel (there by reducing travel by vehicles)</u></p> <p><u>TR7 To seek to improve access to education, healthcare and shops and services.</u></p> <p><u>TR8 To mitigate any harmful effects of HGV and other commercial traffic on narrow rural roads and lanes.</u></p> <p>ECC recommend objective 1-5 are reviewed / consolidated / re-ordered and propose the following changes: <i>TR4) To seek improvements to <u>active and sustainable travel options including and the provision of public transport</u></i> <i>TR1) & TR2 are merged</i> <i>TR3) To mitigate the impact of new development on local <u>highway and transport networks</u></i></p>	The wording of the Vision and Objectives of the NP cannot be changed at this stage as the wording has been through a public consultation process. Making further changes at this stage would require re-consultation and that would delay the process unnecessarily.	No change.

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Essex County Council	113.	6. Housing	6.1-6.4 Pg 37-47	<p>Whilst ECC is not the housing authority it is important for ECC to be involved in housing delivery for the following reasons:</p> <ul style="list-style-type: none"> • For health and wellbeing – to provide a safe, stable and accessible home to support health and wellbeing, inclusion and enable independence for all ages. This is especially the case for the more vulnerable residents where ECC has a specific care role. • For children and young people – good quality, affordable housing provides the basis for a positive family environment to support children to get the best start in life. • For a strong, inclusive and sustainable economy – housebuilding and the maintenance and improvement of existing homes plays a vital role in providing jobs, revitalising places and helping to promote Essex as a place to live, work, invest and study. • For a high quality of life and environment – housing and the built environment is essential to achieving our ambitions on climate action ensuring new and existing homes and places are designed to support the transition to net zero greenhouse gas emissions. Infrastructure must be delivered alongside new housing growth and housing that meets local needs, creating great places where existing and new communities benefit from a high quality of life. <p>ECC can provide the following updates in relation to housing for the ageing population and specialist housing accommodation set out below;</p> <p>ECC draws your attention to the Essex Planning Officers Associations Essex Design Guide which provides extensive guidance on the design of housing developments, and has series of design principles for the ageing population embedded throughout, that provide an insight into how best to support people to live in adaptable homes as they age. However, these principles should not be seen as being of benefit exclusively to the ageing population. Rather, they represent opportunities to positively impact the lives of older people and people with a range of health conditions, encouraging and enabling independent living by: ensuring homes and communities are flexibly designed and can adapt to user needs; providing options for self-care and self-support through digital connectivity; and supporting general health and wellbeing through the delivery of high-quality, considered design</p> <p>In respect of Specialist Accommodation / Adult Social Care – Design ECC can advise</p> <ul style="list-style-type: none"> • New homes and places should be designed for residents to live independent, healthy and safe lives. Planning policies should ensure that homes are designed to be flexible and adaptable, so that residents homes can accommodate their changing needs, with appropriate futureproofed digital technologies, to allow residents to age in place, live independently and remain in their homes throughout their lifetime. • Neighbourhoods and new communities are designed to enable people of all ages to move around safely and with confidence. In respect of design (site characteristics) ECC is currently reviewing our specialist housing location and design requirements to be included in an updated version of ECC Developers' Guide for Infrastructure Contributions, and recommend this is kept under review when progressing this Plan, • ECC recommend policies require all new dwellings to be built to Building Regulations Part M4(2) 'accessible and adaptable dwellings standards' (or subsequent equivalent Building Regulations / Government standards), and at least 10% of new homes (market and affordable dwellings) should be built to Building Regulations Part M4(3) 'wheelchair accessible standards' (or subsequent equivalent Building Regulations / Government standards) to meet the needs of people living with disabilities and older households with such accessible properties within Plan periods. ECC's Developers' Guide will be providing further details on policy guidance and requirements in 2023/24. 	Noted. The policies referred to (NB1 and NB4) already make appropriate reference to specialist housing and to design guidance. No further changes are proposed.	No change.

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				<i>ECC recommend that the Neighbourhood Plan, policies NB1 and NB4 and the Design Code have regard to the Essex Design Guide and the design principles for the ageing population embedded throughout; and seek new housing to be designed to Part M standards (see below), to be inclusive for all age groups</i>		
Essex County Council	114.	NB1 Infill and Redevelopment to Provide New Housing	Pg 39-40	<p>See ECC comment on Section 7.8 and Section 8.1 re EV charging</p> <p>ECC recommend the last bullet is updated</p> <p>Justification from Evidence Base – - expanded to include</p> <p>Essex Design Guide</p> <p>SUDS Design Guide for Essex</p> <p>EPOA Parking Guidance (see Section 10.4)</p> <p>Draft Essex Electric Vehicle Charge Point Strategy</p> <p>ECC recommend that the Last bullet point should be: ... level of “<u>electric</u>” charging facilities.</p>		<p>Amend policy NB1 evidence base to include</p> <ul style="list-style-type: none"> • Essex Design Guide • SUDS Design Guide for Essex • EPOA Parking Guidance (see Section 10.4) • Draft Essex Electric Vehicle Charge Point Strategy <p>Amend last bullet point of policy NB1 to read:</p> <p><i>“ The proposal provides an appropriate level of car <u>electric vehicle</u> charging facilities”</i></p>
Essex County Council	115.	NB2 Extensions to Existing Dwellings	Pg 41	<p>ECC welcome the reference to the Essex Design Guide, however recommend policy wording is changed to have “regard to” the EDG; and that the</p> <p>Justification from Evidence Base – is expanded to include the EDG</p> <p>ECC recommend that the first bullet is amended</p> <p><i>1. the proposal is of an appropriate scale, size and mass and the materials proposed and design have <u>regard to</u> been informed by the Essex Design Guide and the standards as set out in the Noak Bridge Character Appraisal and Design Code;</i></p>	Noted. Changes accepted	<p>Add Essex Design Guide to NB2 evidence base.</p> <p>Amend bullet point 1 in policy NB2 to read:</p> <p><i>“ the proposal is of an appropriate scale, size and mass and the materials proposed and design have <u>regard to</u> been informed by the Essex Design Guide and the standards as set out in the Noak Bridge Character Appraisal and Design Code”</i></p>

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Essex County Council	116.	7. Environment and Green Space	7.3-7.5 Pg 53-65	<p>Please refer to ECC comments and Recommendations under</p> <ul style="list-style-type: none"> - Section 4 Vision and objectives covering Section 7.3 Biodiversity (policy NB7) and 7.4 NB Nature reserve (Policy NB8) and 7.5 Green and Blue Infrastructure (policy NB9). - section 7.8 Flood and Drainage and (policy NB12). - Section 8. 1 (Sustainable Development and Climate Change – proposed policies and policy NB13 <p>As set out in the vision ECC considers these elements to be interconnected and has suggested an over-arching GI Policy / template. These comments are also applicable to the NB Design Code</p> <p>ECC recommend references to biodiversity are reviewed to identify where reference to securing biodiversity <u>net</u> gain in biodiversity rather than simply biodiversity is more relevant.</p> <p>ECC recommend policy NB.7 is amended to require All development is required to deliver a minimum of 10% BNG consistent with the Environment Act 2021 and NB Design Code NB01.1.</p>	<p>Please see earlier comments about proposed GI policy (response 109).</p> <p>Please see earlier comments about amending Vision and Objectives (responses 109 & 110).</p>	No change.
Essex County Council	117.	7. Environment and Green Space	7.8 Pg 74	<p>The section is entitled “Flooding and Climate Change”, however the section and policy NB12 solely focus on “Flooding and Drainage”, which Section 8 “Sustainable Development” concerns Climate Change. For clarification, it is suggested that the name of the section is changed to Flood Risk and Sustainable Drainage, to align with the focus of the section and Policy NB12.</p> <p>Recommend the name of Section 7.8 is changed to “<u>Flood Risk and Sustainable Drainage</u>”</p>	Noted	Change Section 7.7 heading to read: “ <u>Flooding Risk and Climate Change Sustainable Drainage</u> ”
Essex County Council	118.	7. Environment and Green Space	7.8 Pg 74-81	<p><u>Sustainable Urban Drainage Systems (SuDS)</u></p> <p>The role of ECC, as Lead Local Flood Authority (LLFA) as a statutory consultee responsible for the management of Local Flood Risk, which is defined as surface water flooding, ordinary watercourse flooding and groundwater flooding. The Environment Agency deal with coastal flooding and main river flooding. The LLFA is a statutory consultee in the preparation of Local Plans and determining planning applications, and responsible for providing and working with partners to deliver a range of flood and water management services.</p> <p>As set out in ECC's Neighbourhood Planning Guide (2019), the LLFA can provide advice and information on planning for flood risk, including requirements arising from Surface Water Management Plans (SWMPs) and Action Plan, any potential development within Critical Drainage Areas (CDAs), interactive mapping and data regarding SuDS and on our delivery of capital projects.</p> <p>The LLFA works with the Environment Agency (EA), the board of Water Resources East (WRE) (see section 8.1), and the Local Government Association.</p> <p>The Essex Flood Partnership Board, covering Greater Essex brings together all key stakeholders, to provide a strategic overview of flood risk management, key projects, strategies and funding across Essex to ensure a consistent and coordinated approach is implemented. Partners include the Flood Risk Management Authorities (the EA, the LLFA's, the highways authorities, and the Water and Sewerage undertakers) and Essex local authorities.</p> <p>As mentioned in Section 7.5 the LLFA is a key partner of the Essex Local Nature Recovery Partnership (LNP) (to ensure linkage between GBI & nature-based flood and water management solutions (including water scarcity).</p>	Noted. Reference will be made to the SuDS Design Guide for Essex in the evidence base for policy NB12.	Include reference to Essex County Council being the LLFA in section 7.8.

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				<p>The LLFA is responsible for preparing and maintaining the Essex Local Flood Risk Management Strategy 2018. It sets out the ambitions, strategic objectives and measures to reduce the impact of local flooding in Essex, from man-made drainage systems, small watercourses and rainfall off the land. In planning for future floods from ECC Preliminary-Flood-Risk-Assessment-(2011) to Surface Water Management Plans (SWMP's) to identifying Critical Drainage Areas (CDA's) and action plans to focus investment and evidence to inform local plan and responses to planning applications, and the plan area should be in conformity.</p> <p>The revised South Essex SWMP provides evidence and data to better plan for future local surface flood risk for the Basildon borough, which updates the South Essex SWMP (2012). Within the borough there are 19 defined CDA's identified based on the 'Hydraulic Catchment' and the EA's latest Climate Change Allowance. The latest CDA flood data and interactive hydraulic modelling is available in Surface Water Management Section of the Sustainable Drainage Systems Design Guide for Essex (SuDS Design Guide) and supported by the South Essex SWMP Action Plan 2020 which focuses investment .</p> <p>There are <u>no</u> Critical Drainage Areas located within the Plan Area</p> <p>ECC welcome the referenced to SuDS Design and recommend that the parish consider including reference to the SuDS Design Guide for Essex, within the supporting text and Policy. The SuDS Design Guide for Essex sets the LFFA's local standards to be applied on new development and local plan preparation and applications. This Guide (and National Standards) strongly prioritises local needs and use of SuDS covering the four key pillars of water quantity, quality, biodiversity and amenity in SUDS design. Promoting SuDS within the development and features natural drainage with natural solutions to slow the flow and mitigate flood risk should be reflected and SuDs should promote multifunctional benefits to the environment and community in accordance with the NPPF and PPG. New national SuDs Guidance is expected in 2024 and implementation of Sch.3 of the Flood and Water Management Act 2010 (to form SUDS approval Bodies).</p> <p>ECC can advise that If works are to be undertaken involving an ordinary watercourse (including minor works) then consent must be given by the LLFA as set out in the SuDS Design Guide - Section 23 Ordinary Watercourse Consents section, as required by Section 23 of the Land Drainage Act 1991</p> <p>The ECC Developers' Guide to Infrastructure Contributions (Developers' Guide) Section 5.11 (Flood and Water Management and SuDS) provides the requirements to incorporate the provision of SuDs within new developments, infrastructure provision, maintenance and S106 Contributions.</p> <p>The Essex Design Guide also provides links to the SuDS Design Guide and guidance on the application of SuDS in relation to: Climate Change and SuDs, Health and Wellbeing, Garden Communities; Green Infrastructure; the Solar Farms Flood Risk and SuDs and Design Details including: Flood-management; Landscape and Green Spaces; Essex Green Infrastructure Standards-Technical-Guidance (June 2022), the Highway Technical-Manuals (and SuDs Manual).</p> <p>ECC recommend that the Parish ensure that the Plan, Policy NB12 and Design Code are consistent with NPPF. The NPPF requires consideration of <u>all</u> sources of flooding, paragraph 159 which states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere. Paragraph 169 also requires major developments to incorporate sustainable drainage systems and which should provide multifunctional benefits.</p> <p>To assist ECC can recommend the following policy:</p>	<p>Noted. Reference will be made to there being no Critical Drainage Areas located within the Plan Area.</p> <p>Noted. Policy NB12 already covers all sources of flooding and has taken as its reference the various paragraphs referred to by the County Council in their representations (see the evidence base section beneath policy NB12). It is to be noted</p>	<p>Amend Section 7.8 to clarify that there are no Critical Drainage Areas located within the Plan Area.</p> <p>Update all NPPF references to reflect the December 2023 version paragraph numbering.</p>

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				<p><i>Development proposals should take account of the relationship between the site concerned and the drainage and water disposal profile of the neighbourhood area taking into account the current and future impacts of climate change so as to avoid, where possible, flood risk to people and property.</i></p> <ol style="list-style-type: none"> 1. <i>Planning applications for developments which are located within an area at risk from flooding must include mitigation measures giving priority to the use of sustainable drainage systems (SuDS) as appropriate to their scale, nature and location:</i> <ol style="list-style-type: none"> a) <i>To ensure that surface water run-off will not be increased on or off the site and if possible, will be reduced; and</i> b) <i>To ensure that the development will not increase the risk of flooding elsewhere. Sustainable Drainage System, or other appropriate mitigation measures identified in relevant Flood Risk Assessments, should be satisfactorily integrated into the design and layout of the development; and</i> c) <i>To ensure that all development proposals are safe and flood resilient over their lifetime.</i> 2. <i>Where practicable, sustainable urban drainage systems should be designed to be multi-functional and deliver benefits for wildlife, amenity, and landscape.</i> 3. <i>The design of SUDS should have regard to 'Sustainable Drainage Systems Design Guide for Essex and successor documents.</i> <p>ECC can also advise that and recommend the Parish consider the following with links to the Noak Bridge Design Code</p> <ul style="list-style-type: none"> • Where it is proposed to provide SuDS within the public realm these should be designed as an integral part of the multifunctional green infrastructure and street network, responding positively to the character of the area. Where hard landscaping is needed the use of porous materials should be maximised to enable infiltration. • Schemes that incorporate rainwater harvesting to capture, store and reuse grey water will be supported. Where proposed, the design of the tank should complement the building, avoiding unsightly pipework, and, wherever possible, be combined with landscaping or planters with integral water capture systems (Design Code R.02). • The need for new developments consequently increases the impermeable areas and mitigation against any future flood risks should be discussed. ECC welcome the reference to SuDs as part of new developments and that their importance and benefits should be considered.. <p>ECC recommend the section is reviewed and updated against the information supplied</p> <p>ECC recommend that Section 7.8 is revised to refer to ECC as the LLFA, and include data contained within the South Essex Surface Water Management Plan; the SuDS Design Guide for Essex; and for the SuDS Design measures within the Plan, Policy NB12 and the NB Design Code (R.03) to incorporate natural flood management strategies and multi-functional SUDs measures.</p>	<p>that the paragraph numbers have changed since those representations were written and are now as follows:</p> <ul style="list-style-type: none"> • Para. 159 is now para. 165 • Para. 169 is now para. 175 <p>For the purposes of updating the text, all NPPF references in this section and elsewhere will be updated to reflect the latest NPPF paragraph numbering.</p> <p>Whilst the new policy is interesting, the wording for policy NB12 addresses the concerns of the local community in relation to SuDS and it is not therefore proposed to delete that policy and replace it with the wording suggested by the County Council.</p> <p>These three bullet points are helpful, but they are detailed process-related matters that will be drawn to the attention of applicants through the LLFA consultation responses on specific applications and do not therefore warrant further amendments to the NP.</p> <p>Section 7.8 will be updated to refer to Essex County Council as the LLFA. However the other recommended changes are considered to be too detailed for inclusion in the NP, which is a community-led Plan with a specific focus on the parish of Noak Bridge.</p>	<p>See above for changes.</p>

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Essex County Council	119.	8. Design and Conservation	8.1 Pg 81-83	<p>ECC recommend the Parish consider separating out this section between Sustainable Development and Climate Change Mitigation and Adaptation. At present the main supporting text concerns Climate Change however the policy is a mix of Climate Change and Sustainable Development.</p> <p>Set out below are some additional information in response of both topics and suggest policy and themes</p> <p><u>Overarching Policy Sustainable Development</u></p> <p>ECC recommend the policy is re-written to be criteria-based concentrating on the key local 'place shaping' principles that any future development will be required to consider. ECC considers this approach would provide more clarity with regards what constitutes sustainable development as referenced in criterion ii). Some examples are provided below for the parish council to consider in terms of their relevance to the Vision, Objectives and nature of the Plan area and the evidence base.</p> <ul style="list-style-type: none"> • <i>Optimise the use of suitable previously developed land for development within defined settlement boundaries.</i> • <i>Ensure development is well connected and in sustainable locations served by the necessary deliverable infrastructure.</i> • <i>Protects and enhances the natural and historic environment with regards its character and assets (including their setting) within the site and its surrounds.</i> • <i>Provides high quality design, varied density and beautiful homes which contribute positively to the character and appearance of the surrounding area and will not result in significant harm to neighbouring residents amenity.</i> • <i>Will not result in any detrimental impact on local highway capacity and safety.</i> • <i>Incorporates sustainable design features which maximise energy efficiency (including heat generation and distribution), multifunctional green and blue infrastructure, biodiversity net gain, innovative low carbon technology, water efficiency, flood resilience including natural flood management strategies and multi-functional sustainable drainage (SuDS) measures, sustainable waste and mineral management.</i> • <i>Provides for sustainable movement by walking, cycling, scooting, horse riding and passenger transport within the site and to key destinations and local community facilities.</i> • <i>Provides an appropriate provision of parking having due regard to the Essex Parking Standards or successor document.</i> • <i>The design and standard of any new development should aim to meet a high level of sustainable design and construction including measures which minimise waste reduction, re-use and recycle minerals, and use sustainable materials, including in relation to their procurement and be optimised for energy efficiency, targeting zero carbon emissions.</i> • <i>Includes a mix of housing sizes, types and tenures (including those for older people and people with disabilities), including affordable housing and self-build which meet the current and future housing needs of area taking into account the existing housing stock.</i> • <i>Provides a safe, active, well designed and accessible environment where crime and disorder. and the fear of crime do not undermine the quality of life, health and wellbeing and community cohesion;</i> 	<p>The Steering Group understand and appreciates the suggested differences in terminology put forward by the County Council.</p> <p>The plan has been developed to reflect the wishes of the community of Noak Bridge who have identified the issues in policy NB13 as being of key concern to them through successive consultation exercises.</p> <p>The wording of the Vision and Objectives of the NP cannot be changed at this stage as the wording has been through a public consultation process. Making further changes at this stage would require re-consultation and that would delay the process unnecessarily.</p> <p>The information covered in this part of the representations is detailed. NP policy NB13 already seeks to support proposals that achieve accessibility to local facilities and services and this is the level of detail that is considered appropriate for the policy.</p> <p>To add further detail about multi-functional greenways, surfacing of routes and detailed design matters goes</p>	No change.

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				<p>With regards bullet 7, ECC support the principle of establishing multifunctional greenways to promote sustainable and active travel movements and contribute to health and wellbeing. Their design will depend on whether they are to be within an urban or rural environment and their function (recreational; commuting). Most should be designed with a hard, permeable surface which is accessible in all weathers and for people with mobility impairments, those in wheelchairs, use for leisure and fitness pursuits such as skateboarding and rollerblading, for commuting journeys to work and to school and to provide new leisure opportunities from development into the countryside. Where possible these routes should be funded by developers where they directly relate to development. Any design of new routes will be required to be consistent with cycling infrastructure design (LTN 1/20) and to be coherent (allow people to reach day to day destinations easily); direct, safe, comfortable and attractive, as referenced in paragraph 1.5.2 of the guidance.</p> <p>Further information, evidence and guidance is set out within the Essex Design Guide.</p> <p>ECC recommend the Parish consider separating out this section between Sustainable Development and Climate Change Mitigation and Adaptation, to provide two respective overarching policies.</p>	<p>considerably beyond the scope of the policy and is not considered to be appropriate for inclusion in policy NB13 or in the supporting text at section 8.1 of the NP as a result.</p> <p>Furthermore it is not considered necessary to separate out policy NB13 into two separate policies dealing respectively with Sustainable Development and Climate Change Mitigation and Adaptation given that the policy is effective as drafted and is appropriate to its local context.</p>	
Essex County Council	120.	8. Design and Conservation	8.1 Pg 81	<p>As indicated above, ECC recommend that the name of section 7.8 is changed to Flooding and Drainage, in contrast, section 8 focusses on Climate Change and Sustainable Development. ECC recommended that for the name of this Section is also changed to recognise the focus of the section, namely Climate Change, Mitigation and Adaptation.</p> <p>ECC recommend that the name of the section is changed to <u>“Climate Change Mitigation and Adaptation”</u></p>	Noted.	No change.
Essex County Council	121.	8. Design and Conservation	8.1.4 and 8.1.6 Pg 82	<p>Paragraphs 8.1.4 and 8.1.6 both refer to “zero carbon” for consistency ECC recommend that all references to “zero carbon” should be changed to “net zero” as set out in paragraph 8.1.5, to be measurable and to align with national carbon reduction commitments. The national commitment is set through the Climate Change Act 2008, which was updated in 2019. It legislates that the UK</p> <p>ECC recommend references to zero carbon in the Plan and local design code are reviewed and changed to “Net Zero Carbon”</p>	<p>The Basildon Borough website address referenced at NP footnote 32 includes the phrase ‘zero carbon’ several times, rather than ‘net zero’. The NP was drafted to reflect this because it was directly referencing the Council’s Strategy.</p> <p>However for the sake of consistency with the Climate Change Strategy and Action Plan hosted on the same web page, which refers throughout that document to ‘net-zero carbon’, the text of the NP and Design Code will be amended.</p>	Change all references in NP and Design Code from ‘zero carbon’ to ‘net-zero carbon’.

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Essex County Council	122.	NB13 Sustainable Development		<p>must be net zero carbon by 2050 and sets a system of carbon budgets to ensure that the UK does not emit more than its allowance between now and 2050.</p> <p><u>Climate Change Mitigation and Adaptation</u></p> <p>ECC recommend consideration is given to including a specific policy on climate change in the next iteration of the Plan given that BBC has adopted the Basildon Council Climate Change Policy in March 2021 and Climate Change and Strategy Action Plan was adopted in July 2021 for the council to be carbon neutral by 2030 and the borough by 2050. ECC has drafted the following draft policy which LPAs and NPs can consider for inclusion as a single policy or to embed the principles in relevant policies.</p> <p><u>Policy: Climate Change, Mitigation and Adaptation</u></p> <p><i>Development proposals are required to demonstrate how they will mitigate, adapt and be resilient to a changing climate and facilitate the move to a net zero carbon future. All development must:</i></p> <ol style="list-style-type: none"> 1. <i>Contribute to achieving local and national climate objectives and targets.</i> 2. <i>Achieve radical reductions in greenhouse gas emissions including from transport, resource use, energy use, and carbon emissions embodied in materials, transportation and construction processes.</i> 3. <i>Be fossil fuel free and maximise on and off-site renewable energy generation and low carbon energy technology proportionate to their scale and type, and support the transition to a smart, flexible, decentralised energy system.</i> 4. <i>Result in net zero (operational) carbon emissions from both regulated and unregulated energy use prioritising a fabric first approach, minimising energy use and achieving operational energy balance on-site where renewable energy generation matches or exceeds predicted annual energy demand.</i> 5. <i>Promote the efficient use of natural resources including ensuring new buildings are flexible, energy and water efficient and adaptable to future uses through re-use or re-design rather than demolition, thereby reducing the need for future development, retrofitting existing development, minimising waste and supporting the transition to a circular economy.</i> 6. <i>Through their location, mix of uses, and design, improve accessibility for all through making efficient use of land, minimising the need to travel and maximising trips by sustainable and active transport modes and public transport both within and between new developments to support the decarbonisation of transport.</i> 7. <i>Conserve and enhance the natural and historic environment and cultural heritage according to their international, national and local significance and increase built and natural environment distinctiveness through locally distinctive, high quality, beautiful and sustainable design and well-connected multi-functional green and blue infrastructure.</i> 8. <i>Contribute positively to the health, wellbeing and resilience of people and communities,</i> 9. <i>Protect and enhance carbon storage in our natural environment (including the marine environment).</i> 10. <i>Avoid or minimise and mitigate light, water, air and noise pollution and improve or maintain air and water quality.</i> 	For the response to the suggested new policy, please see response to representation 119 above.	No change. Please see response to representation 119 above.

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				<p>11. Support integrated water management (IWM) through a coordinated and holistic approach to land and water management, including managing water storage, supply, efficiency, wastewater, fluvial and coastal flood risk (including taking into account flood risk implications from the latest projections for climate change), quality of watercourses and the coast and the wider environment.</p> <p>12. Contribute positively to environmental growth, protecting irreplaceable habitats and the integrity of ecosystems, restoring natural processes and strengthening nature recovery networks, and ensuring net gain for biodiversity commensurate with the scale of development.</p> <p>13. Conserve and improve the capacity of soils for sustainable production of food, water, raw materials and energy.</p> <p>14. Assess the implications and risks of a changing climate over the lifetime of a development, including the potential future requirement to relocate vulnerable development and infrastructure, based on the latest available projections.</p> <p>15. Measures to adapt and mitigate the risks (including overheating) but avoiding responses to climate impacts that lead to increases in energy use and carbon dioxide emissions must be incorporated.</p> <p>Information proportionate to the scale of the development proposed must be submitted as part of a Sustainability Statement with any planning application to demonstrate how the measures incorporated into the proposal meet the policy requirements.</p> <p>The following is provided for information and context on this matter.</p> <p>ECC recommend reference is made to the independent Essex Climate Action Commission (ECA) report Net Zero: making Essex Carbon Neutral (July 2021) published in July 2021 and ECC’s response titled the Essex Climate Action Plan 2021. Its recommendations are relevant to all Essex local authorities, parish and town councils, as well as Essex businesses, residents, and community groups. It covers a wide range of topic areas including land use and green infrastructure provision, energy, waste, transport plus the built and natural environments. ECC is keen to work alongside partners to secure the highest standards required to address climate change and deliver net zero carbon development and to embed these standards within Local and Neighbourhood Plan policies.</p> <p>ECC consider that the Plan should consider higher requirements for new homes than the requirement to be in accordance with national Building Regulations. ECC refer the parish council to the recently published “Planning Policy Position for Net Zero Carbon Homes and Buildings in Greater Essex” (November 2023) (see attached) which will be available on Essex Design Guide - Net Zero website. It has been prepared through the Essex Planning Officers Association (EPOA) in collaboration with all the Essex LPAs (including Basildon BC). This includes: -</p> <ul style="list-style-type: none"> • A “Net Zero Development (in operation) policy” which requires new buildings to meet high building fabric and energy efficiency standards, does not use fossil fuel and maximises renewable energy generation to achieve operational energy balance; and • a “place holder” for an “embodied carbon policy” which sets out an approach that requires the assessment and reporting of embodied carbon in developments over a defined size threshold and identifies industry good practice benchmarks as targets to aim for. Embodied carbon can be defined as the CO2 emissions associated with materials 	<p>Reference to these documents will be added to the evidence base for policy NB13.</p> <p>In his Ministerial Statement on Local Energy Efficiency Standards on 13 December 2023, Lee Rowley Minister of State for Housing, made clear that <i>“A further change to energy efficiency building regulations is planned for 2025 meaning that homes built to that standard will be net zero ready and should</i></p>	<p>Add reference to Essex Climate Action Commission (ECA) report Net Zero: Making Essex Carbon Neutral (July 2021) and the Essex Climate Action Plan 2021 in the evidence base to policy NB13.</p>

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				<p>and construction processes throughout the lifecycle of a building and infrastructure. It includes emissions related to manufacturing of building materials, the transport of materials to site, and construction processes including demolition</p> <p>ECC will be working alongside each LPA to embed the policy and its justification in Local Plans. This will formulate the strategic policy on net zero to which Neighbourhood Plans need to be in conformity with.</p> <p>ECC is working with local authorities through the new Climate and Planning Unit, with funding from the ECAC, to establish a robust evidence base to support the development of a consistent approach towards new build net zero carbon development in Essex. ECC has completed 3 key pieces of evidence which specifically support the development of a clearly defined planning policy for Essex that will ensure new development is 'net zero carbon' from the outset and aligns with our local and national climate targets. These pieces of evidence demonstrate that building to net zero is:</p> <ul style="list-style-type: none"> • technical feasible (including cost analysis) to build to a clearly defined net zero standard which aligns with climate targets. The Essex Net Zero Policy Study was completed in July 2023. • financially viable of building to a net zero standard. The 'Net Zero Carbon Viability and Toolkit Study' was completed in August 2022 by Three Dragons consultants; and • legally justified for requiring a net zero standard that goes beyond building regulations. The Essex Open Legal Advice on Energy Policy and Building Regulations was published in April 2023. <p>All this evidence is stored on the Essex Design Guide. net zero evidence page.</p> <p>Work is also progressing on the Net Zero Carbon Policy – Renewable Energy Offset Fund. Offsetting will only apply as a last resort in circumstances where renewable energy generation on site is not technically possible to match annual energy demand and there is an identified shortfall. Current proposals are for a countywide mechanism to be administered by ECC based on the cost of providing roof top solar pv in Essex on both council owned and non-council owned public amenity facilities (to be determined).</p> <p>A key climate issue in the East of England in the future is water scarcity. ECC are also on the board of Water Resources East (WRE) and are working with partners (EA and water industry and local authorities) in safeguarding a sustainable supply of water, at the regional level, and to develop an Essex Water Strategy for the county (see section 8.1).</p> <p>The Water Resources East Regional Plan for Eastern England, (January 2022) shows how growth, energy, food, agriculture, and public water supplies are undermined by water insecurity and that we are facing a regional water crisis, with Essex one of the counties most affected. Water Resources East is working to ensure there is a framework for securing water supply to 2050. There is also a need to improve water quality and protect local wildlife in rivers and seas.</p> <p>The Essex Water Strategy project is looking more closely at these challenges and identifying actions to be taken locally which impact on Essex's communities, businesses and council services. It is the role of water supply companies to fully assess the viability of long-term strategic water supply solutions, such as new reservoirs, piped water transfers or desalination technologies. Smaller scale interventions include using less water in our homes; installing smart meters to identify leaks, ensuring new developments are water efficient; and deliver nature-based solutions to hold back water within the environment.</p> <p>ECC recommend tree planting is identified as a means of tackling climate change. In 2019 ECC established the Essex Forest Partnership (2019) comprising the 12 district, borough and cities in Essex to share and coordinate tree planting</p>	<p><i>need no significant work to ensure that they have zero carbon emissions as the grid continue to decarbonise. <u>Compared to varied local standards, these nationally applied standards provide much-needed clarity and consistency for businesses, large and small, to invest and prepare to build net-zero ready homes.</u></i></p> <p><i>The improvement in standards already in force, alongside the ones which are due in 2025, demonstrates the Government's commitment to ensuring new properties have a much lower impact on the environment in the future. In this context, <u>the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale. Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well-reasoned and robustly costed rationale that ensures:</u></i></p> <ul style="list-style-type: none"> • <i>That development remains viable, and the impact on</i> 	

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				<p>targets across Essex. ECC has committed to planting at least 375,000 trees by 2025 and have already planted some 142,000 over the first two years. The aim is for the Essex Forest Initiative to continue to grow beyond the 5-year programme. If planting rates continue at the rates of this initiative one million trees will be planted by 2030.</p> <p>The ECAC Report recommended a target for Essex renewables to meet all the County's needs by 2040. ECC considers all types of on/off site renewable projects are important to reach net zero by 2050. ECC recommend reference is made to the ECAC Essex Baseline and pathway to Net Zero energy report including the roles decentralised small-scale and large-scale renewable generation will play. On site generation in new development is vitally important in enabling energy resilience but needs to be complemented by off-site renewables if the transition to a low carbon, decentralised energy system is to be achieved. The provision of solar farms may help to achieve these targets and any future applications should have regard to the EPOA Solar Farm Guiding Principles.</p> <p>ECC is preparing an Essex Electric Vehicle Charge Point Strategy (EVS) to help with the roll-out of charging infrastructure and help achieve the net carbon zero objectives set out by the ECAC Report 2021. The draft strategy was subject to public consultation between June - July 2023. Some issues to be considered in the strategy include how electric vehicles fit in to the wider transport agenda of decarbonising transport which is a key theme within the next iteration of the ECC Local Transport Plan (LTP4) which is being prepared. The EVS will consider a range of electric vehicle charging options off and on street for residential and commercial users which are fairly priced, reliable, accessible, safe and easy to use. Collaboration will be undertaken with the Distribution Network Operators to ensure sufficient capacity exists on the grid. Car users will need some education to try and influence behaviours regarding electric vehicles and charging. ECC will seek to work closely with local authorities to identify locations for charging points that are accessible and to work collaboratively on funding opportunities.</p> <p>The existing guidance Essex Parking Standards (2009) is being updated to reflect changes in planning legislation and policy, introduction of Garden Communities and a greater awareness on the need to manage the impact of developments on local communities and the environment. The updated guidance is currently on consultation until 4th December and can be viewed here with guidance and standards for EV in Section 4.</p> <p>Residents could be encouraged to switch to greener and cheaper energy providers and take advantage of grants for home insulation. ECC recommend additional support can be obtained from the Citizens Advice Essex - Tackling Fuel Poverty and Warm Homes Essex. Further investigation could be undertaken regarding the opportunity for ground-sourced heating systems and district heating networks. ECC recommend reference is also made to energy efficiency, decarbonising heat and retrofitting existing homes. ECC support any encouragement in providing micro-hydro-electricity schemes and solar PV roof and ground mounted (domestic and non-domestic) and the identification of lower agricultural grade land that is suitable for renewable energy schemes.</p> <p>In progressing the Plan, ECC recommend the parish council consider the following renewable energy issues to inform the next stage of the Plan, namely:</p> <ul style="list-style-type: none"> • What is the balance between the electricity used and produced across the community? How much energy could the neighbourhood produce to meet their own need? • What forms and scale of renewable energy could carry support in the community – roof based solar installations, ground mounted systems (large and small), solar canopies on car parks, onshore wind? Public support for these technologies is strong BEIS PAT Spring 2022 Energy Infrastructure and Energy Sources (publishing.service.gov.uk) • Where could renewable developments be suitable within the Plan area – ECC is making geospatial data available to parishes and communities for assessing renewables potential in due course. 	<p><i>housing supply and affordability is considered in accordance with the National Planning Policy Framework.</i></p> <ul style="list-style-type: none"> • <i>The additional requirement is expressed as a percentage uplift of a dwelling's Target Emissions Rate (TER) calculated using a specified version of the Standard Assessment Procedure (SAP)."</i> <p>As a consequence, NP policy NB13 will not be amended to seek higher requirements for new homes than the requirement to be in accordance with national Building Regulations.</p> <p>The documentation identified in the remainder of representation 122 is of interest and key documents will be sign-posted in the general evidence base where appropriate.</p>	<p>Add references to the various documents identified in representation 122 in the general evidence base, where appropriate.</p>

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				<ul style="list-style-type: none"> • Would the community support renewable energy schemes that are owned by and benefit them? • What opportunities are there to create a district heat network and what sources of renewable heat are there available to them? An example is the Swaffham Prior Heat Network - Cambridgeshire County Council • How do households (and businesses) feel about energy costs? How concerned are households about energy efficiency and finding ways to produce more of their own energy? <p>Further advice and assistance (at a cost) to draft a low carbon neighbourhood plan to help reduce carbon emissions and adapt to climate change impacts can be sought by contacting the Centre for Sustainable Energy, please contact us at communities@cse.org.uk for a quotation.</p> <p>ECC recommend the supporting text is expanded and Policy NB13 is updated with higher requirements having regard to the additional evidence, information and Guidance supplied by ECC. In particular the EPOA's Planning Policy Position for Net Zero Carbon Homes and Buildings in Greater Essex" (November 2023) (see attached)</p> <p>Specifically, ECC recommends consideration of an Climate Change, Mitigation and Adaption Policy</p>		
Essex County Council	123.	NB13 Sustainable Development	Pg 82	<p>Policy NB13</p> <p><u>Bullet 2</u> – ECC recommend it should include provision of SuDS and have regard to the SuDS Design Guide.</p> <p><u>bullet 4</u> (and Design Code R.03 Construction & Materials) refers to the construction techniques which supports development that can demonstrate sustainability through design, construction and use of low carbon technologies. As the Waste Planning Authority, ECC seek to promote waste reduction, re-use and recycling, sustainable building design and the use of sustainable materials, including in relation to their procurement, consistent with Policy S4 of the MLP.</p> <p>ECC recommend changes to the supporting text, a change to bullet 4 and an additional criterion; and Design Code R.03 include reference to MLP and are amended to ensure conformity with this policy S4.</p> <p>ECC recommend that the Policy Justification and Evidence Base is updated to including reference to the SuDS Design Guide, Minerals Local Plan, the Essex Design Guide and in particular the Essex Design Guide Net Zero Evidence set out above</p> <p>ECC recommend that the following changes to policy NB13</p> <ul style="list-style-type: none"> • 2. use of grey water recycling and rainwater harvesting, <u>and application of SuDS having regard to the SuDS Design Guide for Essex</u> • 4 to read as follows: <i>use of energy efficient materials and <u>sustainable construction techniques and an additional</u></i> • an additional criterion to read:- <i><u>The design and standard of any new development should aim to meet a high level of sustainable design and construction including measures which minimise waste reduction, re-use and recycle minerals, and use sustainable materials, including in relation to their procurement and be optimised for energy efficiency, targeting zero carbon emissions.</u></i> 	Review policy NB 13 and update accordingly in line with representations	Update policy NB13

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ID	Rep. No	NBNP Policy	Para in NBNP	Comment	Noak Bridge PC Response	Change to Plan / Comment
Essex County Council	124.	NB13 Sustainable Development	Pg 83	<p><u>NEW Policy – Digital Infrastructure</u></p> <p>Policy NB13 bullet 7 refers to <i>access to high speed communications infrastructure</i></p> <p>ECC welcome the references however ECC note that this is the only reference to high speed communications within the Plan and recommend this is expanded within objective, supporting text and policy, with consideration given to a locational criteria. ECC recommend that the reference is updated to refer to <u>Digital Infrastructure</u>.</p> <p>The following is provided for information and context Digital Connectivity and the need to future proof digital infrastructure</p> <p>ECC has published its Digital Strategy for Essex (2022) which seeks to further expand digital infrastructure and technologies, in addition to that being delivered by the Superfast Essex Programme.</p> <p>ECC recommend the supporting text is amended to refer to Digital infrastructure and Policy NB12, part 1 bullet 7 amended to make reference to applicants being required to have regard to the Essex Design Guide. The policy justification should make reference to the supplementary planning guidance for Planning for 5G which can be viewed in the Essex Design Guide - 5g and Planning Guidance for digital connectivity focused on fixed line broadband connections.</p> <p>It is imperative that new proposals follow the approach outlined in the EDG with regards the Pre-application checklist requirements for both LPAs and Mobile Network Operators (MNOs) regarding justification of need; site selection; baseline environmental data; mitigation; local connectivity impact and the planning process. It is essential that both the LPAs and Mobile Network Operators work collaboratively at the pre-application stage given due consideration to the advice provided by LPAs. Most telecom masts are now covered under permitted development rights but still require an application to the LPA to approve its location and appearance.</p> <p>ECC recommend the following additional policy wording in relation to Digital Infrastructure:</p> <p>ECC recommend consideration is given to the need to support future proofing digital connectivity and high-quality mobile coverage for all homes and businesses. In January 2023, amendments were published to the Building Act requiring that new homes are installed with the fastest broadband connections (gigabit) available within a cost cap. Even where a gigabit-capable connection is not possible within this cost cap, the new homes will be future-proofed with physical infrastructure to support gigabit-capable connections when they become available.</p> <p>For clarity, ECC recommend the following an additional paragraph in supporting text to read:</p> <p>ECC recommend the following 3 parts are either added to policy NB13, or are incorporated into a separate Digital Connectivity Section:</p> <ul style="list-style-type: none"> • <u>Digital Infrastructure</u> <i>The location and design of any above-ground network installations shall be sympathetically chosen to not adversely affect the character of the local area, having regard to the guidance and principles contained in the Design Code and the Essex Design Guide, as appropriate.</i> • <u>Future proofing Digital & Mobile connectivity</u> <i>Proposals for new developments or expansion of existing properties should be capable of receiving gigabit speed and reliable mobile and broadband connectivity. Proposals will be supported where the appropriate cabling and ducting is provided to the premises and linked to infrastructure networks, enabling the fastest available connections. Where</i> 	Noted. These requested changes go considerably beyond the scope of this policy and are not considered to be appropriate for inclusion in policy NB13 or in the supporting text at section 8.1 of the NP as a result, although the documents will be signposted in the relevant evidence base section of the NP.	Add reference to relevant documents mentioned in representation 124 to the evidence base for NP policy NB13 or the general evidence base.

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				<p><u>connectivity is not currently available suitable ducting that can accept superfast broadband, fixed line gigabit-cable broadband and/or 5G connectivity should be provided to the public highway or other suitable location.</u></p> <ul style="list-style-type: none"> <u>Suggested additional supporting text for clarity: Where necessary, improvements to mobile reception may include the need for new mobile phone masts. Where provided, these should be designed to minimise visual intrusion and respond to the character of the area.</u> 		
Essex County Council	125.	NB14 Air Quality	Pg 84-85	<p><u>ECC as Highway and Transportation Authority can provide the following information in relation to the A127 and the Air Quality Direction</u></p> <p><u>A127 Corridor</u> As outlined in the 2014 A127 Corridor for Growth - An Economic Plan 2014, the Route Management Strategy, the A127 corridor is of strategic importance for south Essex (and Essex) and an essential access point for Basildon residents and businesses to the wider highway network. An A127 Task Force has been established to co-ordinate transport requirements within the A127 corridor, formed by ECC and partners (including ECC, South Essex Councils, London Borough of Havering and Highways England/National Highways).</p> <p>ECC is seeking investment in the A127 because it connects major centres of population and employment including the A127 Enterprise Corridor and access to Town Centres; the volume of trips exceeds many other A-roads; the need to improve safety, reliability and predictability along the route; the current performance of the route limits ability to prosper from growth across the wider region; to provide resilience improving traffic management responses to incidents, capacity and sustainable travel improvements enabling improvements to assist accommodating future housing and employment growth ambitions, including regarding London Southend Airport.</p> <p>ECC is currently preparing a business case for the Major Road Network (MRN) investment programme with regards improvements to the Fortune of War, Basildon and Halfway House, Brentwood junctions, to reduce congestion; support economic growth and housing delivery; support all road users; and improve safety and resilience. The mechanism for this is via the A127 Task Force, of which BBC is an active participant.</p> <p>The A127 has been identified as having air quality issues which will need to be addressed, with reference to Strategic Outline Case - Air quality Management Plan A127 (March 2018) with the implementation of a reduced speed limit on the A127 and the Defra Air Quality Direction in 2019.</p> <p>There may be a need to safeguard land for on or offline improvements along the A127 corridor, which could include junction improvements and or other capacity improvements. Any such improvements will need to be complemented by sustainable transport improvements in the surrounding area.</p> <p>ECC as Highway and Transportation Authority is currently preparing a countywide Air Quality Strategy, which will inform the Local Transport Plan (LTP4), setting out the current baseline position in Essex, identify and prioritise areas of concern and set out actions to be taken to improve air quality. ECC will be liaising with BBC to help address the requirements of their Air Quality Action Plans and Clean Air Strategies, to which Neighbourhood Plans need to be in conformity with.</p> <p>ECC recommend that the Parish consider and require the Plan Policy to have regard to the Air Quality Management guidance 'Land-Use Planning and Development Control: Planning for Air Quality' (2017) and the Essex Design Guide Air-quality. The Essex Design Guide section which has aligned health and wellbeing, planning and placemaking to provide practical, specialist guidance and support to help deliver best practice development for Essex.</p>	<p>The documentation identified in representation 125 is of interest and key documents will be sign-posted in the general evidence base and the evidence base for policy NB14 where appropriate.</p> <p>The additional criterion proposed will add weight to the policy.</p>	<p>Add references to the various documents identified in representation 125 to the general evidence base and the evidence base for policy NB14 where appropriate.</p> <p>Add new criterion (4) to policy NB14 to read:</p> <p><i>“4. New developments should have regard to Air Quality Management guidance ‘Land-Use Planning and Development Control: Planning for Air Quality’ (2017) and the Essex Design Guide Air-quality”</i></p>

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				<p>ECC also recommend that the Plan and policy NB14 seek to ensure that all developments are air quality neutral and do not lead to further deterioration of existing poor air quality, having regard to the individual and cumulative impacts. And recommend a range of points to be considered as set out in the Essex Design Guide – including for example - Has an appropriate level of assessment been completed, see EPUK & IAQM Planning Guidance for criteria on whether a detailed assessment is required?</p> <p>ECC also draws the Parishes attention to the additional Post Submission Examination Documents (January 2023) which informed the proposed Post Submission modification to the now withdrawn Basildon Local Plan BLP Examination - Proposed Post Submission Modifications Consultation Jan 2023, Whilst the local plan was withdrawn the new supporting evidence continues to provide some weight in decision making.</p> <p>- PSD014-Basildon-LP-Air-Quality-Review-May-2020 PSD015-Basildon-Council-Climate-Change-and-Air-Quality-Topic-Paper-Sept-2020</p> <p>ECC recommend the an additional criterion changes to Policy NB14, as follows</p> <p>4. <i>New developments should have regard to Air Quality Management guidance 'Land-Use Planning and Development Control: Planning for Air Quality' (2017) and the Essex Design Guide Air-quality</i></p>		
Essex County Council	126.	NB15 Design Principles	Pg 85-88	<p>ECC welcome the reference to the Essex Design Guide and identifying the four themes and the reference to the Essex Design Guide (EDG) setting out best practice guidance and design principles along with detailed technical guidance on highway design and flood management in the paragraph</p> <p>ECC can advise that the EDG also provides a wide scope of matters including a Highways Technical Manual; Sustainable Drainage Systems Design Guide for Essex; and newer sections regarding Garden Communities; Ageing Populations; and Health and Wellbeing, active design principles; Livewell Development Accreditation (LDA) and Health Impact Assessments (HIA); HIA criteria and the Essex Quality Review Panel reviews.</p> <p>More recent additions include Planning for 5G, Solar Farm Guiding Principles and Climate Change (including Net Zero development) as set out in ECC's response to throughout the Neighbourhood Plan and the local design code</p> <p>ECC recommend the policy is changed to recognise the breadth of material and that Bullet 7 should be updated to have regard to the Essex Design Guide and the EPOA Essex Parking Standards Guidance (and successor documents) for the reasons set out in response to Section 8.1 and for consistency with the Design Code.</p> <p>ECC recommend that section 8.3 and Policy NB15 are reviewed against ECC's comments and proposed changes and policies outlined in Section 7.8 and 8.1 and policies NB12 and NB13. This is to ensure consistency across the Plan.</p> <p>ECC also recommend the following changes to policy NB15</p> <p>Part 1 <i>New development should contribute to the creation of high quality places through a design-led approach to development underpinned by good practice principles and reflecting a thorough site appraisal, with regard to the Essex Design Code and the SuDs Design Code for Essex</i> and demonstrate how it preserves and enhances features that define the character of the individual area, as highlighted in the Noak Bridge Design Code.</p>	Noted. It is recommended that a distilled version of the proposed amendment to part 1 of the policy be introduced to the start of policy NB15 and key documents referred in representation 126 be added to the evidence base for policy NB15.	<p>Add the following text to the start of policy NB15:</p> <p><i>"New development should contribute to the creation of high quality places through a design-led approach to development underpinned by good practice principles and reflecting a thorough site appraisal and demonstrate how it preserves and enhances features that define the character of the individual area, as highlighted in the Noak Bridge Design Code."</i></p> <p>Add reference the Essex Design Guide, the SuDS Design Code for Essex and the EPOA Parking Guidance in the evidence base for this policy.</p>

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				<p><i>Bullet 7 Provision of appropriate levels of parking for new residential, commercial and community uses, including sufficiently wide roads to accommodate on-street parking where necessary for residential and commercial vehicles without dominating the streetscene and broken up by landscaping, <u>having regard to the Essex Design Guide and the EPOA Planning Parking Guidance (and successor documents) as set out in the Design Code.</u></i></p> <p>Recommend that the “Justification from Evidence Base” is expanded to include the above documents</p>		
Essex County Council	127.	NB21 Noak Bridge Primary School	Pg 104-105	<p>ECC as the Lead Authority for Education welcome the section on education, and note the focus on Noak Bridge Primary School and Pre School. However for the avoidance of doubt and as indicated in the School Organisation 10-Year Plan for Essex School Places :</p> <ul style="list-style-type: none"> • There are other ‘existing facilities’ that serve the Noak Bridge area. 42.8% of the Essex mainstream pupils who live within the priority admissions area set by Noak Bridge Primary attend other schools. • Using the formula set out in the ECC Developers' Guide to Infrastructure Contributions, the number of new qualifying houses required to fully fund a new 2fe primary school is 1,400. <p>ECC can also provide the following additional information, in relation to the wider Education requirements and provision.</p> <p>ECC seek when considering new developments in the preparation of local plans and in responding to planning applications to mitigate the impact on Education provision. The ECC Developers' Guide to Infrastructure Contributions (5.1-5.3), which cover Education from 0 – 19 years of age, from Early Years and Childcare, Primary and Secondary School, Post 16 and Special Education Needs and Disabilities; and Post 16. Section 4.3 requires a developer to identify appropriate land for a new school and to undertake a Land Compliance Study. This should be undertaken as early as possible to demonstrate suitability, deliverability and to inform any site master planning. Developers are expected to fund as appropriate school land, expansion of existing schools and/or provision of a new school to meet the need generated by proposed housing development. Further details of the Guide are set out below in response to section 9.5 and Policy NB24</p> <p>Remove reference to solutions.</p> <p>Policy should focus on sufficient education and childcare places (including EY&C, primary, secondary, post-16 and SEN) within statutory walking distance and reference the need for safe direct routes from development to these schools which make active travel an attractive option.</p> <p>Suggest the policy is reworded as follows: <i>Noak Bridge Primary School is at full capacity <u>in most year groups</u> and with limited further opportunity to expand on site. Therefore all major residential developments should mitigate their impact <u>on</u> of the development on existing education services and facilities serving the NDP area, including in particular the Noak Bridge Primary School and the Pre School that is located in the grounds of the Primary School. Mitigation should take the form of provision of education facilities on a new site serving the development or the enhancement of existing facilities.</i></p>	<p>Noted. The policy has been drafted to reflect the concerns and wishes of the local community. This is a neighbourhood plan, and as drafted, the policy does not conflict with the strategic policies of the development plan. Furthermore it sets out a clear and pragmatic approach to mitigating the impact of additional residential development on existing education services and facilities serving the NP area.</p> <p>There has been no request to modify the wording of the policy from Basildon BC although they are the local authority with responsibility for allocating any future residential development site(s) in the Neighbourhoods Plan Area, and therefore it can be assumed with some confidence that the policy as drafted is consistent with their emerging policy direction of travel.</p> <p>The initial change to line one of the policy is accepted because it adds clarity.</p>	<p>Amend line one of policy NB21 to read: “<i>Noak Bridge Primary School is at full capacity in most year groups and with limited further opportunity to expand on...</i>”</p>

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Essex County Council	128.	9 Local Economy, Education, Health and Other Local Services	9.2.11 Pg 104	<p>ECC as the Lead Authority for Education is responsible for Early Years and Childcare provision; and can provide the following information in respect of EYCC provision and in relation to the area.</p> <p>The Essex Childcare Sufficiency Assessment Summary is used to undertake a cumulative assessment of the growth identified in the preferred spatial strategy. The Essex Childcare Sufficiency Assessment (2021) outlines the current provision of childcare places, and is reviewed annually, for each Ward.</p> <p>According to the most recent Essex County Council (ECC) Childcare Sufficiency data, there are 5 vacancies available in the Crouch ward, with the majority of provision at capacity. It is noted that the Pre-school provision is a private business operation on the School site. The Chancellors' Spring Budget announcement discussed the introduction of 15 funded early education entitlement for working families of 2 year old from April 2024, which will be rolled out in phases to 30 hours of funding for working families of those from 9 months old in September 2025.</p> <p>Expansion of Noak Bridge Pre-School on the school site is not a viable option, therefore with any additional places created by places generated from a major residential development and as a result of the Childcare Reforms, would need to mitigate their impact on EYCC provision and provide the additional full day care, early years and childcare provision would be required to be based on the development site. Any development proposal would need to consider and mitigate their impact as set out in the ECC Developers' Guide to Infrastructure Contributions.</p> <p>ECC recommend a new Paragraph is inserted before paragraph 9.2.11, with reference to the Essex Childcare Sufficiency Assessment (2021) in relation to EYCC provision and the requirements of the ECC Developers' Guide to Infrastructure Contributions</p> <p>ECC recommend the update should also include the following information: -</p> <p><i><u>Where new EYCC provision is built on new development sites, they will be advertised through an ECC's EYCC competitive process to ensure the highest quality provider is on site.</u></i></p>	<p>Noted. This level of detail goes beyond what is considered appropriate for the scope of the policy and the associated supporting text in section 9.2.</p> <p>The documents referred to by the County Council contain detailed provisions that are more suited to informing planning application proposals than higher level NP policies.</p> <p>Reference will be made to key documents in the general evidence base, however.</p>	<p>Add reference to key documents mentioned in representation 128 to the general evidence base.</p>
Essex County Council	129.	NB23 Community Facilities	Pg 108	<p>It is noted that Policy NB23 bullet 1 and as defined in Appendix 3 is the Primary School and Pre-School and are considered to be of particular value. For completeness and consistency, given the EYCC comments and proposed changes in section 9.2, Appendix 3 and the Community Aspirations for the creation of a new nursery in paragraph 11.11, it is recommended that the school and pre-school are named in full in in policy NB23.</p> <p>ECC recommend the following change to Policy NB23 part 1</p> <p><i><u>1) Noak Bridge Primary School and Noak Bridge Pre-school.</u></i></p>	<p>Noted. The policy text will be amended for clarity.</p> <p>The ambition of the community is for the creation of a new primary school therefore the community aspirations section should be amended to delete reference to a nursery.</p>	<p>Amend Policy NB23 part 1 To refer to</p> <p><i><u>"1) Noak Bridge Primary School and Noak Bridge Pre-school."</u></i></p> <p>Delete reference to community aspiration for the creation of a new nursery in paragraph 11.11.</p>
Essex County Council	130.	9 Local Economy, Education, Health and Other Local Services	9.5 Pg 109-111	<p>ECC recommend the Section 9.5 includes the following to recognise the role of ECC as an infrastructure and services provider and to reflect the full scope of the types of infrastructure covered by the ECC Developers Guide to Infrastructure Contributions (2020), which is presently being updated.</p> <p><i><u>As a service and infrastructure provider ECC has its own thresholds and processes for planning obligations as set out in the ECC Developers Guide to Infrastructure Contributions (2020). Planning obligations may be required for the following service areas:</u></i></p>	<p>Noted. Paragraph 9.5.3 will be updated to refer to the County Council's Developers Guide to Infrastructure Contributions document and the topics it covers.</p>	<p>Amend paragraph 9.5.3 to read as follows:</p> <p><i><u>"Basildon Borough Council has also published a Supplementary Planning Document (SPD) that sets</u></i></p>

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				<ul style="list-style-type: none"> • <i>Early years and childcare</i> • <i>Schools</i> • <i>School transport and sustainable travel</i> • <i>Employment and Skills Plans</i> • <i>Highways and transportation</i> • <i>Sustainable Travel Planning</i> • <i>Passenger Transport</i> • <i>Public Rights of Way</i> • <i>Waste Management</i> • <i>Libraries</i> • <i>Flood and Water Management and Sustainable Drainage Systems (SuDS)</i> <p>ECC acknowledges the projects identified in Appendix 3 and the aspirations in paragraph 11.11. At present there is no funding and/or designs for these schemes, which may be funded in the future through S106 contributions, Community Infrastructure Levy (once adopted) or other relevant funding sources. ECC would welcome consultation with regards these projects as set out in the relevant sections of the plan and summarised below:</p> <p>CF1 Noak Bridge Primary School and Pre School</p> <p>CF5 Noak Bridge Car Park</p> <p>To amend section 9.5 to cognise the role of ECC as an infrastructure and services provider and to reflect the full scope of the types of infrastructure covered by the ECC Developers Guide to Infrastructure Contributions (2020), and to engage with Appendix 3, in particular ECC with CF1 and CF5 in particular</p>	<p>Noted.</p>	<p><i>out the Council's approach and procedures in respect of the use of any planning obligations.</i></p> <p><i>As a service and infrastructure provider ECC has its own thresholds and processes for planning obligations as set out in the ECC Developers Guide to Infrastructure Contributions (2020). Planning obligations may be required for the following service areas:</i></p> <ul style="list-style-type: none"> • <i>Early years and childcare</i> • <i>Schools</i> • <i>School transport and sustainable travel</i> • <i>Employment and Skills Plans</i> • <i>Highways and transportation</i> • <i>Sustainable Travel Planning</i> • <i>Passenger Transport</i> • <i>Public Rights of Way</i> • <i>Waste Management</i> • <i>Libraries</i> • <i>Flood and Water Management and Sustainable Drainage Systems (SuDS)</i> <p><i>These will need to be negotiated on a site by site basis to ensure that infrastructure improvements are provided to make a development acceptable....”</i></p>

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Essex County Council	131.	10 Transport and Roads	Pg 111-117	<p><u>ECC as the Highways and Transportation Authority (H&TA)</u> can provide the following information</p> <p>ECC seeks to improve safety and the resilience of the transport network through securing and maintaining all transport assets to an appropriate standard and ensure that the network is available for use. ECC seeks to deliver a step change in sustainable travel across the county, by growing passenger transport and active travel, and supporting the move towards net zero, climate resilient developments, including new garden communities, by delivering sustainable, healthy neighbourhoods for the future and contribute to mitigating climate change. The Safer Greener Healthier campaign seeks to make it as easy as possible for Essex residents to travel more sustainably, especially for shorter journeys by walking, cycling, e-scooter or taking the bus or train for longer journeys. A strong bus network helps key workers get to work; children get to school; older people to access shops and healthcare; reduces congestion; improves air quality; and helps mitigate climate change. Work has progressed on a new LTP4 for the period up to 2050 covering four strategic themes including low carbon transport options; supporting people, health and wellbeing; creating sustainable places and communities; and connecting people, places and businesses. This is in accordance with the findings of the ECAC Report</p> <p>ECC is the H&TA is responsible for transport strategy, policy, the management, maintenance and operation of local transport networks, and the implementation of necessary improvements.</p> <p>The current ECC Transport Policy is comprised of the following:</p> <ul style="list-style-type: none"> • the Local Transport Plan (2011) (LTP3); • the recommendations in the ECAC Net Zero: Making Essex Carbon Neutral report; and • the Transport East: Transport Strategy (2022). <p>The ECAC recommendations seek to achieve net zero carbon transport emissions in Essex by 2050. Future transport strategy will comprise an Avoid, Shift, and Improve approach to transport.</p> <p>ECC has commenced work on LTP4, which will reflect and incorporate the ongoing revised policy framework including:</p> <ul style="list-style-type: none"> • the Net Zero: making Essex Carbon Neutral (ECAC) recommendations and the Transport East: Transport Strategy (see above). • a revision to the existing Functional Route Hierarchy (FRH) in LTP3 which favours the free flow movement of vehicle traffic over sustainable modes. A new Place and Movement approach reflecting the new ECC Safer, Greener, Healthier campaign is being prepared with its focus on the function of a place with priority given in the first instance to pedestrian and cycle movements and then access to high quality public transport. The FRH is to be re-classified based on 9 different street and road types recognising the variation in function across Essex. Each street and road type will perform a different function and modal priority, each with different priorities. <p>As well as LTP4 (and its Implementation Plans) this new approach will inform the preparation and/or revision of other ECC policy documents which will need to be considered in preparing local and Neighbourhood Plans, including the Bus Service Improvement Plans (BSIP); Development Management Policies (2011); Sustainable Travel Planning (walking and cycling Strategies); Essex Electric Vehicle Charge Point Strategy; Basildon Local Cycling and Walking Infrastructure Plans (LCWIPs); the Transport Technology Strategy; and Network Management Plans and Maintenance Strategies. Review of the EPOA Essex Parking Standards (2009)(currently out for consultation); and</p>	<p>The introduction of a Freight, Home Deliveries and Servicing policy goes beyond the scope of the NP and is not reflective of the wishes of the local community conveyed to the Steering Group through the various consultation exercises.</p> <p>As a result it is not intended to add a new policy covering this topic area.</p> <p>Key document references in representation 131 will be added to the general evidence base for information purposes.</p>	<p>Add key documents to the general evidence base, including the following:</p> <ul style="list-style-type: none"> • The Local Transport Plan (2011) (LTP3); • The ECAC Net Zero: Making Essex Carbon Neutral report; • The Transport East: Transport Strategy (2022); • The Essex Electric Vehicle Charge Point Strategy; • The EPOA Essex Parking Standards (2009) • Basildon Local Cycling and Walking Infrastructure Plans (LCWIPs)

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				<p>ECC is currently preparing a countywide Air Quality Strategy, which will inform LTP4, setting out the current baseline position in Essex, identify and prioritise areas of concern and set out actions to be taken to improve air quality. This will assist within any requirements for BBC in relation to Air Quality Action Plans and Clean Air Strategies.</p> <p><u>Freight and Servicing -</u></p> <p>Development proposals for freight and servicing will be expected to consider the four main actions regarding 'last mile deliveries' as set out in the UK Transport Decarbonisation Plan (page 140). Where relevant, a development will be expected to be accompanied by a Freight Management Strategy setting out how freight and servicing will be managed and mitigated within the development. This is particularly relevant with the increase of deliveries from online shopping.</p> <p>ECC recommend the Parish consider the following</p> <p><u>Freight, Home Deliveries and Servicing</u></p> <p><i>Proposals must submit a Freight Management Strategy setting out how freight, homes deliveries and servicing will be managed and mitigated within the development- for approval. The Strategy should have regard to the adoption and implementation of the following methods to manage urban logistics:</i></p> <ul style="list-style-type: none"> • <i>Neighbourhood delivery and servicing hubs.</i> • <i>Micro-consolidation centres.</i> • <i>E-cargo bike delivery schemes for last mile' deliveries for business and residential areas.</i> • <i>Promotion of cargo-bikes to residents.</i> • <i>Freight and Servicing Plans for high trip generating sites.</i> <p>ECC recommend the Parish have regard to ECC's additional Guidance, evidence and policies and strategies</p> <p>ECC recommend the NP includes consideration of freight and servicing which, and the last mile, given the increase in internet shopping</p>		
Essex County Council	132.	NB25 Highways, Safety and Sustainable Travel	Pg 115-116	<p>Policy NB25 – Highways, Safety and Sustainable Travel</p> <p>As set out in section 4 transport objectives, ECC recommend that policy</p> <p>ECC recommend the policy and list of matters are redrafted to provide clear criterion with matters regarding safe access and visibility being required to be assessed by ECC, as the highway and transportation authority, against the ECC Development Management Policies (2011) (DMP) and the Essex Design Guide Highways Technical Manual - Planting in sight splays, with reference to 'current standards'.</p> <p>ECC recommend criterion is amended to refer to the need to prepare and submit a Transport Assessment or Statement (TA/TS), as these will cover all aspects covered within a specific criterion. The detailed schedule of thresholds for TA/TS is contained in Appendix B of the ECC Development Management Policies (2011). The TA will identify the sustainable transport measures that will be required to ensure that the site is accessible by a choice of modes other than the private car, including cycling, walking, public transport and horseriding. It should also assess the residual impact of the development traffic on the highway network, including identifying appropriate mitigation to ensure there is no detrimental impact on the safety and capacity of the highway network.</p>	Agreed – a reference will be added.	<p>Amed policy NB25 to read:</p> <p><u>" All new development will be required to</u></p> <ul style="list-style-type: none"> • <u>Submit a Transport Assessment or Statement as appropriate</u> • Where justified <u>Prioritise active and sustainable travel for walking and cycling and secure road safety improvements particularly for pedestrians and cyclists.</u> • <u>Maximise opportunities for active and sustainable</u>

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ID	Rep. No	NBNP Policy	Para in NBNP	Comment	Noak Bridge PC Response	Change to Plan / Comment
				<ul style="list-style-type: none"> • <i>Provide safe and convenient access for vehicles, and pedestrians access, egress and appropriate with visibility splays consistent with current standards to serve all new developments</i> • <i>Promote travel plans for all new commercial, community and residential developments as applicable within ECC's Development Management Policies and have regard to ECC's</i> • <i>The proposals should also have regard to Essex Design Guide, Developer Documentation (Highways Technical Manual); Streets Materials Guide for advice to developers on highways design and successor documents</i> • <i>Should be in conformity with the NB Design Code</i> <p><i>Where traffic calming measures are proposed, these should be designed so as reduce speed and create a better environment for pedestrians and residents not to increase noise or have an adverse impact on residents or users of the route.</i></p> <p>The Justification from Evidence Base should be expanded to include the above documents; and with the Noak Bridge Design Code</p> <p>Buses - ECC, as H&TA draw your attention to Passenger Transport information set out above including the Basildon Borough Bus Network Review (September 2022).</p>		
Essex County Council	133.	NB26 Parking	Pg 117	<p><u>Policy NB26 - Parking Provision</u></p> <p>Whilst the Essex Parking Standards (EPS) and EDG documents are clearly a material consideration when considering development proposals, they do not form part of the adopted BLP and therefore any new development is required to have regard to these standards, which have been adopted by BBC. Paragraph 2.1.1. of the EPS acknowledges that in some cases parking provision will need to be considered on the developments own merit. This will usually be demonstrated through a TA or TS</p> <p>The parking standards should have regard to and be consistent with the current Essex Parking Standards (page 63) and it's successor.</p> <p>As advised in Section 8.1 (Sustainable Development and proposed Climate Change Adaptation and Mitigation Policy) and supporting information, the EPS are currently being reviewed by the EPOA and are on consultation. These will include details of Electric Vehicles for both residential and non-residential uses. More detailed design guidance is provided for both residential and commercial cycle parking taking account of LTN 1/20 guidance.</p> <p>ECC recommend Policy NB26 criterion 2 is replaced with the following:</p> <p><i>All development should have regard to the EPOA Essex Parking Standards Guidance and successor documents as endorsed by ECC as the Highway and Transport Authority and BBC; and the design principles established in the Essex Design Guide. Departures from the Essex Parking Standards (EPS) will require the submission of supporting evidence.</i></p> <p>Insert New criterion 3</p> <p><i>New developments (residential and non-residential) and should have regard to the Essex Electric Vehicle Charge Point Strategy</i></p> <p>The Justification from Evidence Base should be expanded to include the above documents</p>	<p>Noted. These proposed amendments change the nature of the policy and remove the 'local' relevance of the policy.</p> <p>The proposed changes would create a more generic policy that may be better suited to a Local Plan policy than the Noak Bridge NP.</p>	No change.

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Essex County Council	134.	11 Community Aspirations	11.11.1 Pg 118-119	ECC as H&TA note the list of items listed in section 11.11 which could form part of the transport sections. The transport related aspirations will need to be pursued having regard to ECC's existing (and emerging) H&T Guidance, Evidence and policy and strategies as listed by ECC in section 10.1).	Noted	No change.
Essex County Council	135.	11 Community Aspirations	11.11.1 Pg 118-119	Creation of a new Nursery – this will only come forward if development is such that the mitigation (pupil places) requires it. Could be a private facility provision, in which case there will be no requirement for a S106 / CIL contribution. Clarify the mechanism for provision of this facility.	Noted. This is a community aspiration and does not form part of the policy suite in the NP. The mechanism does not need to be clarified in the NP as a result.	No change.
Essex County Council	136.	12 Delivery, Review and Monitoring	Pg 121	ECC recommend the document is reviewed to ensure the correct terminology is used with regards the terms 'footpaths' and 'footways'. At present, most references to the former should refer to 'footways'. For example, pavements beside public roads are not public footpaths and are better referenced as footways. Footways are not recorded on the Definitive Map as Public Rights of Way. A footway is really a part of the main highway which has been set apart for pedestrians. Public footpaths are shown on definitive maps recording public rights of way where anyone has the legal right to use on foot. ECC recommend a change to bullet 5, to ensure the correct terminology ECC recommend bullet 5 is amended to read <i>Parish <u>Public Rights of Way, footways and cycle way updated survey</u></i>	All references to footpaths refer to either rural footpaths in the open countryside to the east and north of the village or to the pedestrian-only routes between housing developments within the village. Where clarification is required to differentiate between footways and public footpaths, this will be undertaken.	Review NP to ensure correct use of terms 'footway' and 'footpath'.
Essex County Council	137.	Appendix 3	Pg 134	As set out above in Section 9.2, the pre-school has explored expansion on the school site, and this will not be viable. ECC recommend that the limitations of expanding the Early Years and Childcare provision on the School site are acknowledged.	Noted. The aspirations identified in Appendix 3 were identified by the community in developing the NP. The text therefore reflects their concerns and it is not proposed to amend it further at this stage.	No change.
Essex County Council	138.	Design Code	N/A	ECC recommend that codes BF1-8, HO.03 and RO1-4 are reviewed against ECC's comments and proposed policies set out in response to Section 4 vision, Section 7 and Section 8.1 and 8.3. Specifically ECC recommend that the Codes are updated with regard to ECC's additional information, evidence and proposed policies in relation to Climate Change Net Zero Carbon Developments, Sustainable Development and Design Principles ECC recommend that codes BF1-8, HO.03 and RO1-4 are reviewed and updated to having regard to ECC's comments and proposed changes and policies in relation to Climate Change Net Zero Carbon Developments, Sustainable Development and Design Principles. In particular - EPOA's Planning Policy Position for Net Zero Carbon Homes and Buildings in Greater Essex " (November 2023) (see attached) with net zero Carbon policies; and	Accepted.	Each code reviewed and amended as per comments

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				The suggested Specifically, ECC recommends consideration of an Climate Change, Mitigation and Adaption Policy		
Essex County Council	139.	Design Code	2-4 Pg 8	<p>The references to the Essex Design Guide (EDG) are welcomed, including the EDG informing the Local Design Code. It is noted in paragraphs 2-4 that the EDG should be read in regard of matters which are more strategic in nature rather than locally specific and that the detailed technical guidance for road design drainage and lighting are also matters for the EDG.</p> <p>This is welcomed, however ECC as Highways and Transportation Authority and the Lead Local Flood Authority recommend that the Codes are changed to explicitly stated that they should have regard to the documents listed below, to ensure the requirements meet the respective statutory consultee design standards.</p> <ul style="list-style-type: none"> • Essex Design Guide, • Essex Design Guide - Highways Technical Manual in particular, Streets and Roads and Parking and Manual for Streets for advice and examples of good practice to guide new development on the best use of street materials. • Sustainable Drainage System (SuDS) Design Guide for Essex • ECC Developers' Guide for Infrastructure Contributions <p>ECC recommend that the respective Codes explicitly require developments to have regard to the following guidance and standards:-</p> <ul style="list-style-type: none"> • Essex Design Guide and supporting Developer Documentation including • Essex Design Guide - Highways Technical Manual and supporting documentation including Streets and Roads and Parking and the Manual for Streets • SuDS Design Guide for Essex • ECC Developers' Guide for Infrastructure Contributions 	Accepted.	Text added as per comments
Essex County Council	140.	Design Code	2-4 Pg 8	<p>Paragraph 4 states that the Essex Design Guide and local design code should work in tandem, which is welcomed, however we recommend further clarification is required on the relationship between the two documents, and suggest that the Local Design code should be in tandem with the EDG.</p> <p>ECC recommend paragraph 4 is changed to provide further clarification on the relationship between the EDG and Local Design Code as follows:</p> <p><i>"The aim of this document is to create a design code which is locally specific to Noak Bridge, however the reader should be aware of the overall themes and design details in the Essex Design Guide, which and this Code should work in tandem with the EDG and be followed in any new development within Noak Bridge."</i></p>	Accepted.	Text added as per comments

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Essex County Council	141.	Design Code	MS.02 Pg 24	<p>The Code states <i>“All street types should including trees and appropriate planting.”</i></p> <p>ECC note that any tree planting is required would require commuted sum for maintenance associated with street tree planting and would need to be planted clear of visibility splays. There would require the need to work with highways officers to ensure that the right trees are planted in the right places, and solutions are found that are compatible with highways standards and the needs of different users consistent with NPPF, paragraph 131. Reference should be made to the EDG: Highways Technical Manual - Planting in sight splays.</p> <p>ECC recommend reference is made to the need to for commuted sum for maintenance, the need to work with ECC Highways and Transportation Authority and to have regard to the Essex Design Guide: Highways Technical Manual - Planting in sight splays</p>	Accepted.	Text amended as per comments
Essex County Council	142.	Design Code	MS.03 Pg 25	<p>Welcome the statements in paragraph 1 regarding meeting the standards in the EDG and recommend for clarification that this is explicitly included within the Code.</p> <p>Code MS.03 states: <i>“The size of the entrance carriageway to a court or square should be 4.1m”</i></p> <p>This entrance width does not meet the requirements of the Highways and Transportation Authority as set out in Essex in the Essex Design Guide - Highways Technical Manual which requires a minimum width of 6m for Mews Courts.</p> <p>Change to read</p> <p><i>The size of the entrance carriageway to a court or square should be 4.1m a minimum of 6m.</i></p> <p>Add the following criterion: -</p> <p><i>The design of Squares, Courtyards and Private Drives are should have regard to the Essex Design Guide EDG - Highways Technical Manual.</i></p>	Accepted.	Text amended as per comments
Essex County Council	143.	Design Code	MS.04 Pg 26	<p>Code MS.04 Private Drives</p> <p>The access dimensions set out in the Essex Design Guide illustration are missing from the Code MS0.4 and recommend that this are included within the Code to ensure conformity.</p> <p>Insert the following text into MS.04</p> <p><i>A shared private drive taking access from street types F or G or a parking square should be 3m wide. A shared private drive taking access from a county route or street types A-E should be 5.5m wide for the first 6m from the street, tapering over 6m down to a minimum width of 3m.</i></p>	Accepted.	Text amended as per comments
Essex County Council	144.	Design Code	MS.05 Pg 27	<p>Code MS0.5 states <i>“All bus stops must provide seating and shelter, and designed such that it is in keeping with the character of the area in which it is sited”.</i></p> <p>This is welcomed, however the requirements should be expanded, to include raised kerb, ancillary infrastructure and where appropriate Real Time information</p> <p>Expand to the requirements at bus stops to include raised kerb, ancillary infrastructure and where appropriate Real Time information</p>	Accepted.	Text amended as per comments

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Essex County Council	145.	Design Code	MS.07 Pg 31	<p>Code MS.07 paragraph 1 ECC as Highway and Transportation Authority welcome the reference to the EDG Manual for Streets and the Essex Design Guide however recommend that this is re-phrased to “have regard to.”</p> <p>Code MS.07 Paragraph 2. ECC draw your attention to ECC’s response to the NP regarding EPOA’s Essex Parking Guidance and the current Consultation which ends on 4th December. ECC recommend reference is made to new development being required to have regard to the Essex Parking Guidance and the 2023 consultation is of relevance and is available here. The relevant documents can be viewed here and are of relevance to this project moving forward.</p> <p>The main changes for Part 1 Parking Standards include:</p> <ul style="list-style-type: none"> • Updated guidance and removal of arbitrary maximum parking values • Compliance with National Planning policy • Improved evidence base • Parking provision based on how accessible a location is • Updates to electric vehicle charging. • Update to cycle parking to align with the new national guidance. <p>Any interventions will need to be progressed in consultation with ECC, as the Highway and Transportation Authority and Lead Local Flood Authority, and/or through the Basildon Local Highways Panel</p> <p>Code MS.07 Paragraph 8. ECC Recommend the first sentence is reviewed, and suggest the word “not” is missing</p> <p>ECC Recommend the following changes to have regard to the latest and emerging Guidance : -</p> <ol style="list-style-type: none"> 1. Car parking should be attractive and functional and <u>have regard to the follow</u> guidance set out in Manual For Streets, the Essex Design Guide <u>or successor documents</u> 2. The number of car parking spaces must meet the requirements for the development type and number of bedrooms as set out by Essex County Council the Highways and Transportation Authority, having regard to <u>the EPOA Parking Guidance or successor documents</u>. 8. <i>On-street parking should <u>not</u> dominate the street scene.</i> 	Accepted.	Text amended as per comments
Essex County Council	146.	Design Code	MS.07.01 Pg 32	<p><u>Tandem Parking</u> ECC can advise that this is addressed in Part 1 para 7.50 of the EPOA Essex Parking Standards Guidance as referred to above is currently out on consultation. It states the following</p> <p><i>Tandem Parking (two cars parked one behind the other) is acceptable on-plot, within the curtilage of a dwelling but not allowed in areas which also offer communal access, e.g. parking courts. They are effective in reducing vehicle dominance at building frontages, but can reduce the uptake of spaces, often used instead for bin storage in rear parking courts, and their provision can encourage on-street parking</i></p> <p>ECC is also preparing an Essex Electric Vehicle Charge Point Strategy to help improve access to EV charging infrastructure to help achieve the net carbon zero objectives set out by the ECAC.</p> <p>ECC recommend the policy is reviewed against the emerging EPOA Part 1 Essex Parking Standards guidance which will include EV Charging Guidance, to ensure consistency at the Regulation 16 stage.</p>	Accepted.	Text amended as per comments

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				<p>Please refer ECC's comments set out in NP section 8.1</p> <p>Recommend that MS.07.01 Car Parking is updated to align with draft Part 1 Essex Parking Standards Guidance Para 7.50, and is explicit that this is only allowed "on-plot" within the curtilage of a dwelling but not in areas which also offer communal access, e.g. parking courts.</p> <p>Reference should also be made to the provision of EV Charging points both on and off plot</p>		
Essex County Council	147.	Design Code	NB01.1 Pg 36	<p>ECC support the proposal for a minim of 10% Biodiversity Net Gain</p> <p>ECC recommend this is applied to NP Policy NB</p>	Accepted.	Code updated to reflect the latest information
Essex County Council	148.	Design Code	NB02.1 and NB02.2 Pg 40-41	<p>Code NB02.1 and NB02.2</p> <p>ECC as LLFA welcome the text and codes however it should be updated to recognise ECC as the LLFA; and have regard to the SuDS Design Guide for Essex</p> <p>See ECC's comments and proposed changes to the Plan in section 7.8 and 8.1 and respective policies</p> <p>ECC recommend the supporting text is reviewed against and updated with ECC's additional information set out in response to the NP and explicitly including reference to ECC as the LLFA and the SuDS Design Guide for Essex</p> <p>Both Codes should include the following</p> <p>SuDS design should have regard to the SuDS Design Guide for Essex (and successor documents)</p>	Noted. See response to NP above on this point.	See above responses to comments 117-120.
Essex County Council	149.	Design Code	NB04.1 Pg42	<p>ECC welcome the comments and recommend the section is reviewed against the addition information and suggested changes on GBI and Biodiversity set out in Section 4 Vision for consistency</p> <p>Review and update to ensure consistency with ECC's comments and additional information set out in the Neighbourhood Plan – Section 4 - Vision</p>	Accepted.	Code updated to reflect the latest information
Essex County Council	150.	Design Code	PS05 Pg49-50	<p>Needs more on maintenance to ensure that quality of the urban form is maintained.</p> <p>Expand to include more information on the maintenance of the quality of the urban form</p>	Accepted.	As per Basildon comments – additional text added
Essex County Council	151.	Design Code	BF02 Pg 65	<p><u>Code BF.02 paragraph 3</u></p> <p>ECC note the references in paragraph 3 and 4 to areas "prone to flood" and the creation of biodiversity corridors. ECC recommend that the Parish review the requirements against Neighbourhood Plan, section 7.5 and 7.8 Policy NB12 and ECC's additional information and proposed changes.</p> <p>ECC recommend that the Code specifically refers to the multi-functional benefits of SuDs and has regard to the Suds Design Guide for Essex, and refer to Code R.02 regarding Sustainable Drainage. and Neighbourhood Plan policy NB12</p> <p>ECC recommend an additional sentence is added to the end of paragraph 3 to read: -</p>	Accepted.	Text amended as per comments

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				<p>...The latter two are of particular importance for areas prone to flood. <u>Regard should be had to the SuDS Design Guide for Essex, and the requirements set out in Design Code R0.2</u></p> <p>Amended para 4 to read</p> <p>Such buffer areas should be planted and maintained as <u>multi-functional green infrastructure including to contribute to a network of biodiversity corridors.</u></p>		
Essex County Council	152.	Design Code	HO.01, HO.02 and HO.03 Pg 76-83	<p>Please refer to ECC response, additional information and suggested changes in response to neighbourhood Plan Section 6.1 and 6.4 and apply these to the supporting text and codes HO.1, HO.2 and Ho.3.</p> <p>ECC recommend that the Neighbourhood Plan and Design Code policies HO.01, HO.02 and HO.03 have regard to the Essex Design Guide and the design principles for the ageing population embedded throughout; and seek new housing to be designed to Part M standards (see below), to be inclusive for all age groups</p>	Accepted.	Text amended as per comments
Essex County Council	153.	Design Code	HO.03 Pg 83	<p>Please refer to ECC response, additional information and suggested changes in response to neighbourhood Plan Section 8.1 regarding climate change, and net zero</p> <p>Review against ECC comments under NP Section 8.1</p>	Accepted.	Code updated to reflect the latest information
Essex County Council	154.	Design Code	R.02 Pg 93	<p>ECC as the Lead Local Flood Authority welcome Code R.02 Sustainable Drainage, and draw your attention to the Lead Local Flood Authority's comments in response to Section 7.8 and policy NB12 of the Neighbourhood Plan</p> <p>The Lead Local Flood Authority recommend that the supporting text is updated to refer to ECC's role as the LLFA, and that Code R.02 is amended to specifically reference the SuDS Design Guide for Essex which provides the local standards to be applied to new development. This Guide (and National Standards) strongly prioritises local needs and use of SuDS covering the four key pillars of water quantity, quality, biodiversity and amenity in SUDS design. Promoting SuDS within the development and features natural drainage with natural solutions to slow the flow and mitigate flood risk should be reflected and SuDs should promote multifunctional benefits to the environment and community in accordance with the NPPF and PPG.</p> <p>ECC recommend that</p> <ul style="list-style-type: none"> the supporting text is amended to refer to ECC as the Lead Local Flood Authority and roles and responsibilities and recommend engagement with the LLFA. Code R.02 is expanded to explicitly include the following text: <u>The design of SUDS should have regard to the SuDS Design Guide for Essex' for Essex and successor documents.</u> 	Accepted.	Text amended as per comments
Essex County Council	155.	Design Code	R.03 Pg 94	<p>Please see refer to ECC's comments on NB Section 2.3 Minerals and Waste Plans</p> <p>Amend to include <u>Sustainable</u> construction techniques</p>	Accepted.	Text amended as per comments

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Essex County Council	156.	Design Code	R.04 Pg 94	Please refer to and apply ECC's comments from Section 8.1 concerning overarching Sustainable Development and Climate Change Mitigation and Adaptation Review against ECC comments under NP Section 8.1	Accepted.	Text amended as per comments
Essex Police – Strategic Planning Essex	157.	General	N/A	Thank you for providing the opportunity to respond to the Noak Bridge Neighbourhood Plan, regulation 14 consultation. We have reviewed the content of the draft plan and although we have no direct comment to make on the proposed plan at this time, we have attached for your information the Essex Police considerations to development and infrastructure change which forms part of the organisations strategic planning considerations. As a key emergency service provider, this document outlines information on Essex policing priorities and provides the organisation's initial considerations to development and infrastructure proposals within the county.	Document contents noted.	None.
Forestry Commission for East and East Midlands Forest Area	158.	General	N/A	No response.	Noted	N/A
Hertfordshire County Council	159.	General	N/A	No response.	Noted	N/A
Historic England	160.	General	N/A	Confirms that, at this present time, has no comments to make.	Noted	N/A
Homes England	161.	General	N/A	No response.	Noted	N/A
Marine Management Organisation (MMO)	162.	General	N/A	No response.	Noted	N/A

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National Highways	163.	General	N/A	<p>National Highways was appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such National Highways works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.</p> <p>We will therefore be concerned with proposals and policies that have the potential to impact the safe and efficient operation of the SRN, in the case of this consultation, particularly the M25, A13 and A1089.</p> <p>We have reviewed the information available on the pre-submission draft Neighbourhood Plan plan for Noak Bridge and have no comment to make at this time however, we will appreciate being kept informed in the future.</p>	Noted	N/A
Essex Police – Police Fire and Crime Commissioner (PFCC)	164.	General	N/A	No response.	Noted	N/A
Last Mile Electricity	165.	General	N/A	No response.	Noted	N/A
Ramsden Crays Parish Council	166.	General	N/A	Confirms that was included in the Agenda for the Council's meeting in October. No additional comments were received.	Noted	N/A
Woolsington One Limited c/o Eleanor Lovett – Claremont Planning Consultancy Ltd	167.	General	N/A	<p>It should therefore be recognised that the NP is required by the 'Basic Conditions' to conform to the strategic policies of the adopted Development Plan, as well as national policy and contribute to the achievement of sustainable development; however, the strategic policies of the Development Plan no longer meet these requirements. Importantly, the strategic policies are not meeting the requirements for housing, as evidenced by the significant shortfall of housing land supply acknowledged by Basildon Borough Council. As the Council has recently recommenced the preparation of a replacement Local Plan, it is considered that the preparation of the Neighbourhood Plan should be paused until that process has reached a more advanced stage. Noak Bridge has previously been recognised in the plan-making process as a sustainable location for development, with sites proposed to be released from the Green Belt as evidenced through previous versions of the Plan. It is considered likely that the emerging Local Plan will seek to secure some development at Noak Bridge, requiring amendments to Green Belt boundaries, in order to ensure that the emerging Local Plan is capable of meeting housing needs and securing a sustainable approach to development in the Borough across the emerging plan period. The NP should therefore recognise the requirements of the Framework in particular through Paragraph 29 whereby the Plan should not seek to promote less development than is set out in the strategic policies for the area, or seek to undermine those strategic policies.</p>	<p>The NP does not propose policies that will deliver less development than the emerging Local Plan envisages for the Plan area.</p> <p>In contrast the scale of development envisaged by the emerging Local Plan at Noak Bridge will be complemented by the provisions in the NP.</p> <p>The NP looks forward as well as backward and wherever appropriate it will reflect the</p>	No change.

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				<p>By seeking to prepare the Neighbourhood Plan in advance of the Council's preparation of a new Local Plan, and in the context of a substantially out of date Development Plan, and anticipated publication of a new NPPF, the Noak Bridge NP risks being superseded by imminent changes to local and national policy. This could render any policy in the NP 'out of date' very soon after it is made or even during its examination, lessening the weight that can be given to the policy during the consideration of any planning applications and necessitating an immediate review of the NP. The preparation of the Neighbourhood Plan should be paused in order to review the progression of both local and national policy, enabling the NP to be modified to reflect those policies and priorities and enhance the role that it can play when future planning applications are considered at Noak Bridge.</p>	<p>direction of travel in the emerging Local Plan. The general conformity Basic Condition only applies to the strategic policies contained in the development plan for the area of the authority. The emerging Local Plan is not part of the development plan yet, but the NP nevertheless seeks to ensure that its policies will be in general conformity with the emerging strategic policies in order to future-proof the NP</p>	
<p>Woolsington One Limited c/o Eleanor Lovett – Claremont Planning Consultancy Ltd</p>	<p>168.</p>	<p>1 Introduction & Background</p>	<p>1.7 Pg 11-12</p>	<p>The NP is proposed to cover a plan period up to 2042. Section 1.7 establishes that this has been determined to align with the intended plan period of the emerging Local Plan, recognising that this may need to be reviewed and updated to ensure it remains in conformity with the Local Plan period and strategic policies of the Local Plan when it is eventually adopted.</p> <p>This conflicts with the approach of the NP in respect of the relationship with the Development Plan as considered above, which seeks to proceed ahead of the preparation of the Local Plan. As set out above, it is considered that the preparation of the NP should be paused until the preparation of the new Local Plan has progressed to an advanced stage. This would ensure consistency between the two layers of plan-making, and ensure that the NP is given weight in the consideration of planning applications for development in Noak Bridge.</p> <p>In respect of the proposed plan period, the principle of extending this until 2042 is supported. However, this is subject to ensuring that the scale of development envisaged by the emerging Local Plan at Noak Bridge, which as yet is to be determined, is facilitated by the provisions of the NP. Without ensuring consistency with the emerging Local Plan, the NP will not be aligned with the growth required at Noak Bridge for the emerging plan period, and will not contribute towards achieving sustainable development or ensure consistency with strategic policy.</p>	<p>The NP does not allocate sites for housing or propose policies that will deliver less development than the emerging Local Plan envisages for the Plan area.</p> <p>In contrast the scale of development envisaged by the emerging Local Plan at Noak Bridge will be complemented by the provisions in the NP.</p>	<p>No change.</p>
<p>Woolsington One Limited c/o Eleanor Lovett – Claremont Planning Consultancy Ltd</p>	<p>169.</p>	<p>1 Introduction & Background</p>	<p>1.8 Pg 12-13</p>	<p>The draft NP sets out the stages of plan-making, identifying the stages that the Plan has already been through prior to this current consultation. This includes stakeholder engagement, however it is considered that the Steering Group has not undertaken sufficient engagement thus far during the preparation of the draft NP. In particular, it is considered that the Steering Group should have sought to engage directly with the landowners and promoters of land such as Woolsington One Limited. This could have provided the opportunity to discuss potential designations with landowners, as well as how landowners and promoters could help to deliver the aspirations of the Neighbourhood Plan such as the Community Aspirations noted in Chapter 11 of the draft NP.</p> <p>It is considered that further stakeholder engagement should be undertaken with Woolsington One Limited, promoters of land north of Wash Road as a minimum, as well as other landowners and promoters of other development opportunities and land around Noak Bridge. These should take place before the draft NP proceeds and inform an updated version of the draft NP to ensure that opportunities to achieve sustainable development are optimised through the plan-making process, in accordance with the Basic Conditions.</p>	<p>The agent and landowner have had several opportunities to engage with the NP process both electronically and in-person and appear to have chosen not to engage until now. In particular consultation events / exercises have been held in September 2019 (questionnaire); July 2021 (walking workshop and further questionnaire); April 2023 (policies; options etc consultation); and September</p>	<p>No change.</p>

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					<p>2023 (Regulation 14 consultation).</p> <p>This is a non-allocating NP and therefore the appropriate forum for policy discussion about potential housing allocation sites would be with the Borough Council as part of the emerging Local Plan, and not through this NP process.</p>	
<p>Woolsington One Limited c/o Eleanor Lovett – Claremont Planning Consultancy Ltd</p>	<p>170.</p>	<p>2 Planning Policy Context</p>	<p>2.1 Pg 13-14</p>	<p>The draft NP recognizes the requirement for compliance with national planning policy, and identifies the various iterations of the NPPF, including the most recent version published in September 2023. It is important that the draft NP is updated as and when the next version of the NPPF is published, which is anticipated shortly following the Levelling Up and Regeneration Act receiving Royal Assent in October 2023.</p> <p>In addition to the sections of the Framework identified in 2.1.3 of the draft NP, reference should also be made to the provisions of Paragraph 16, in the Plan-making section of the Framework. This establishes requirements such as ensuring that plans are prepared with the objective of achieving sustainable development; are prepared positively; and are shaped by early, proportionate and effective engagement between plan-makers and communities. The preparation of the draft NP should recognise the requirements of the Framework and ensure that all relevant provisions are referenced and inform the preparation of the NP.</p>	<p>Noted</p>	<p>All documents will be updated to reflect current policy and other references (including the latest version of the NPPF).</p> <p>All relevant sections have informed the preparation of the NP.</p>
<p>Woolsington One Limited c/o Eleanor Lovett – Claremont Planning Consultancy Ltd</p>	<p>171.</p>	<p>2 Planning Policy Context</p>	<p>2.2 Pg 14-15</p>	<p>This section of the NP recognises the policy context of Basildon Borough, referencing the Saved Policies of the Basildon Local Plan which forms the Development Plan. This chapter of the draft NP makes no reference to the emerging planning policy context however, including the new Basildon Local Plan which is currently being prepared. As set out previously in these representations, the relationship between the draft NP and the Development Plan is critical in order to ensure that the Neighbourhood Plan meets the ‘Basic Conditions’. Furthermore, the current Development Plan for Basildon was adopted more than 25 years ago, and was not prepared on the basis of current national policy and guidance. It should therefore be recognised within this context for the NP that there will be implications arising from review of the Local Plan and importantly that the NP will need to reflect the strategic policies and priorities of the Local Plan Review in order to ensure consistency between the different layers of policy.</p>	<p>The NP looks forward as well as backward and wherever appropriate it will reflect the direction of travel in the emerging Local Plan. The general conformity Basic Condition only applies to the strategic policies contained in the development plan for the area of the authority. The emerging Local Plan is not part of the development plan yet, but the NP nevertheless seeks to ensure that its policies will be in general conformity with the emerging strategic policies in order to future-proof the NP.</p>	<p>No change.</p>

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Woolsington One Limited c/o Eleanor Lovett – Claremont Planning Consultancy Ltd	172.	3 The Neighbourhood Plan Area	3.2.8-3.2.10 Pg 21-22	<p>In respect of housing, there is a lack of specific recognition of affordable housing needs, despite this being a significant issue across Basildon as evidenced through a number of planning appeal decisions. The evidence also points to the 2017 South Essex Strategic Housing Market Assessment, despite this not being the most up to date source of housing need assessment, as it was superseded last year by the 2022 Housing Needs Assessment (HNA). This HNA is specifically referenced later in the NP, suggesting that the Steering Group recognises that more recent evidence has been published, although not reflecting this in the background and context of the draft NP. It is critical that preparation of a Plan is underpinned by the most recent and robust evidence available, and therefore the housing section should be updated to reflect the conclusions of the 2022 HNA and/or any subsequent publications that arise as part of the preparation of the Borough Local Plan.</p> <p>In terms of the level of housing need, the 2022 HNA references the standard method calculation all the South Essex Authorities, including Basildon, identifying a minimum annual housing need figure for the Borough of 1,041 dwellings. In respect of affordable housing, the 2022 HNA identifies a requirement of 521 dwellings per annum. Whilst there is no requirement in policy to seek to meet affordable housing needs in full when determining an appropriate level of objectively assessed need, the level of housing need in respect of both general housing needs and specifically affordable housing needs is substantial and the draft NP should acknowledge this and support opportunities to address these challenges.</p>	Noted.	Modify 3.2.10. The supporting text to policy NB4 (paragraphs 6.4.1-6.4.12) recognises the affordable housing needs of the Plan area. The references in 3.2.10 will be updated to reflect the 2022 HNA and to ensure consistency between both sections of the NP.
Woolsington One Limited c/o Eleanor Lovett – Claremont Planning Consultancy Ltd	173.	3 The Neighbourhood Plan Area	3.2.22 Pg 28	The draft NP acknowledges that Noak Bridge lies within the Green Belt, with the only parts of the Plan area excluded from it, representing the built-up areas of the settlement. This is a significant constraint for the draft NP and should be acknowledged as this informs the context for the NP and what the Plan can seek to achieve.	Noted	No change.
Woolsington One Limited c/o Eleanor Lovett – Claremont Planning Consultancy Ltd	174.	Vision and Objectives	4.1 Pg 32	It is considered that the Vision as presently drafted is not consistent with national policy. The different strands of the Vision also conflict with each other, as in order to meet the needs of the local community, it is inevitable that there will be an impact on the Green Belt and its openness, given the constraint that this poses. Whilst development can, and should, be planned for in a way that minimises the harm to the landscape and openness of the Green Belt, the urban area presents few opportunities to deliver the level of housing needed at Noak Bridge in order to meet both local housing needs and meaningfully contribute towards Borough-wide housing and other development requirements. As such, the Vision should be modified to reflect this requirement, caveating the intention to maintain the openness of the Green Belt as 'wherever possible' or 'feasible', seeking to minimise the impact on openness arising from the development requirements necessary to meet local needs and be consistent with the strategic policy direction arising from the new Basildon Local Plan.	The Vision for the NP seeks to manage the relationship between the need for additional development (to be planned through the emerging Local Plan) and the need to protect the Green Belt. The approach to delivering housing in Boroughs and Districts that have large areas of Green Belt is principally the concern of those authorities' Local Plans. NPs must be in general conformity with the strategic policies in those Plans and the Noak Bridge NP achieves this.	No change.

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Woolsington One Limited c/o Eleanor Lovett – Claremont Planning Consultancy Ltd	175.	Vision and Objectives	4.2 Pg 32-33	<p>The draft NP identifies a number of proposed objectives, set out in five core groups. Whilst for the most part these objectives are considered appropriate and supported, it should be recognised that there are potential issues that may arise between the objectives of the draft NP and the development needs identified through the emerging Local Plan. This will particularly represent challenges in respect of the environmental objectives seeking to conserve and enhance the rural landscape; and maintaining the openness of the Green Belt as outlined above in respect of the proposed Vision. As such, the objectives should also be reconsidered such that they are framed in a more positive way that recognises that change may be needed as a result of the emerging Local Plan and the potential for development to be delivered at Noak Bridge. Accordingly, as outlined in earlier sections of this report, the draft NP would be most effective if preparation was paused pending the outcome of the emerging Local Plan Review. This would ensure that changes could be made to the draft NP such that it would ensure consistency across the layers of planmaking and removes potential for conflict as the policy context is anticipated to change.</p> <p>It is also considered that in respect of housing, whilst suggesting the Plan will identify housing needs of the local community, it does not suggest that the Plan will look to support or address these needs. It should be recognised that the Parish of Noak Bridge is likely to be identified through the emerging Local Plan as a sustainable location for growth, as was the case with the withdrawn Local Plan. Furthermore, the emerging Local Plan will have to address greater housing requirements as a result of delays to plan-making and the increasing shortfall in housing delivery arising due to the resulting policy vacuum. This reinforces the need for the preparation of the Plan to be paused, subject to the progression of the Local Plan, particularly given the intention for the plan periods to align. This will ensure that should the Local Plan conclude that Green Belt release is necessary and strategic housing allocations appropriate in the Parish, that these can be reflected and influenced by the policies of the Neighbourhood Plan.</p>	<p>There is no requirement to pause the NP process, the Neighbourhood Planning process is set up to enable NPs to come forward ahead of Local Plans without particular issue. Policy conflicts are determined in favour of the most recent document to be adopted / made.</p> <p>Discussions with Basildon Borough Council have not suggested that they have any concern about the NP proceeding ahead of the emerging Local Plan.</p> <p>The NP has been drafted positively and it does not propose policies that will deliver less development than the emerging Local Plan envisages for the Plan area.</p>	No change.
Woolsington One Limited c/o Eleanor Lovett – Claremont Planning Consultancy Ltd	176.	6 Housing	Fig 18 6.1.3-6.1.4 Pg 37-38	<p>The draft NP identifies the housing context of the Parish. As part of this, reference is made to a residents' survey undertaken in 2019, which identified that in a third of households, at least one member wanted to move or may want to move in the next five years. The main reasons for this were people wanting to live independently, or because the existing home was too small. For older people, the reasons differed, and were more related to properties being too large, or too difficult to maintain. This evidence suggests that the current housing stock in Noak Bridge is not adequately meeting housing needs of the existing population, without even taking into account the needs of people who may want or need to live in the Parish but aren't able to because of a lack of available housing.</p>	Noted	N/A
Woolsington One Limited c/o Eleanor Lovett – Claremont Planning Consultancy Ltd	177.	6 Housing	6.1.6 Pg 38	<p>It is also recognised that the Plan area has not recorded significant levels of residential development during recent years. This likely reflects the constraint posed by the Green Belt as well as the lack of policy making in recent years meaning that development opportunities have been restricted. This highlights the need for positive plan-making both at a local and Borough level, in order to address this lack of housing delivery and the need for future housing in the Parish.</p>	This is a non-allocating NP and therefore the appropriate forum for policy discussion about potential housing allocation sites would be with the Borough Council as part of the emerging Local Plan, and not through this NP process	No change..

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Woolsington One Limited c/o Eleanor Lovett – Claremont Planning Consultancy Ltd	178.	NB4 Housing Mix	Pg 47	Policy NB4 requires that proposals are required to demonstrate that the mix of dwelling types, tenures and sizes are appropriate and relate to current and future needs of households in the Plan area. The draft NP should recognise that this need will evolve over time, and whilst evidence has been published alongside the preparation of the Plan, in particular the 2019 residents survey, this represents a snapshot in time and cannot be relied upon in perpetuity. In order for this proposed policy to be effective, it will require the Parish to continually monitor and update this housing evidence in order to ensure that this can inform proposed developments coming forward. Furthermore, the draft NP should recognise the role that housing in Noak Bridge can play in supporting the wider Borough level housing needs, and ensuring a sustainable mix of housing is delivered. It should also be recognised that certain sites will be better placed to deliver certain types of housing, and therefore development proposals should not be unnecessarily restricted due to unsubstantiated concerns regarding housing mix. The policy should be modified to recognise that the housing mix could also be justified based on other evidence, such as Boroughwide housing needs evidence or market-led evidence justifying an existing need for certain types of dwellings.	As the respondent notes, the NP policy NB4 is drafted to require applicants to demonstrate that the mix of dwelling types, tenures and sizes are appropriate and relate to current and future needs of households in the Plan area. This requirement to look to the future acknowledges that need will evolve over time. The suggested changes to the policy to recognise that certain sites will be better placed to deliver certain types of housing goes beyond what the policy is intended to achieve. This is a matter that may be better directed to the emerging Local Plan.	No change.
Woolsington One Limited c/o Eleanor Lovett – Claremont Planning Consultancy Ltd	179.	7 Environment and Green Space	7.1 Pg 47-49	This section of the Plan reaffirms national and local policies relating to restriction of development in the Green Belt. It also confirms the extent of Green Belt in the Parish. This reiterates the constraint that the Green Belt poses to development at Noak Bridge and is likely to be impacted as the review of the Local Plan advances. Accordingly, the NP will need to be reviewed should land be released from the Green Belt through the Local Plan process.	The NP has been drafted to avoid the need for early review by ensuring it is broadly consistent with the emerging Local plan policies. As a general rule, the principles enshrined in the draft NP policies seek to provide a local level of detail in relation to matters of Borough or national planning policy.	No change.
Woolsington One Limited c/o Eleanor Lovett – Claremont Planning Consultancy Ltd	180.	NB6 Landscape Character	Pg 52-53	Policy NB6 of the draft Neighbourhood Plan identifies that proposals should demonstrate how they preserve or enhance the landscape character of the area, as well as reflect characteristics which define the character of the wider landscape. Landscape situated to the north of Noaks Bridge is acknowledged as being in poor condition and influenced by various urban fringe developments. It is considered that high quality residential development to Noak bridge would have the opportunity to deliver significant environmental enhancements, in accordance with key Management Guidelines for LCA9. As is repeated through these representations, whilst the key views and the wider landscape are understood to be valued by the community, there is likely to be a need for development to be delivered at Noak Bridge to meet the wider Basildon needs, and this could impact on those existing views. This is necessary if the existing and emerging housing	This is a non-allocating NP and therefore the appropriate forum for policy discussion about potential housing allocation sites would be with the Borough Council as part of the emerging Local Plan, and not through this NP process. As a result the NP will not seek to identify or favour specific sites.	No change.

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				<p>needs of the Parish are to be accommodated through sustainable forms of development. Previously, through the subsequently withdrawn Local Plan, development was proposed to be allocated at the settlement, demonstrating that despite the landscape, there was an acceptance that land around Noak Bridge was considered suitable to be released from the Green Belt. It is considered that through the emerging Local Plan this will again be considered, in particular through the land promoted to the North of Wash Road, and East and West of Noak Hill Road, on behalf of Woolsington One Limited.</p> <p>The focus for the NP should be to seek to minimise the impact of development on the landscape, and look to secure the most effective forms of development that positively contributes to meeting local needs whilst minimising the adverse impact on the environment as a whole.</p>	<p>Rather the policy framework is intended to:</p> <ul style="list-style-type: none"> • ensure that new development will meet the needs of the local community in delivering sustainable low energy and low carbon, good quality appropriate housing and employment as well as improving existing community, health, education and retail facilities; • preserve and enhance the special character and appearance of Noak Bridge, maintaining the openness of the Green Belt that surrounds the settlement whilst protecting important views, the natural environment and green spaces throughout the Plan Area; and • increase highway safety and deliver improved public transport services and improved parking provision. <p>In seeking to deliver this vision, the framework of NP policies will plan positively for future development whilst ensuring those matters that are most important to the community are reflected effectively.</p>	

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Woolsington One Limited c/o Eleanor Lovett – Claremont Planning Consultancy Ltd	181.	NB11 Important Views	Pg 72-73	<p>It is considered that such a policy could be overly restrictive upon the potential of Noak Bridge to provide high quality, sustainable development. The selected views respond to the extent of built development at Noak Bridge presently, without accounting for the likely growth that will be required at Noak Bridge in the coming years as a result of meeting the housing requirements for both the Parish itself and wider Basildon housing needs. As expressed previously through these representations, Noak Bridge is a sustainable location for future development as was recognised through the previous (withdrawn) Local Plan and has been promoted through the emerging Local Plan. Whilst there remains uncertainty as to where this growth will be delivered, it may be the case that this involves development that impacts adversely on one or more of these important views.</p> <p>The policy should be reframed to acknowledge the potential impact of necessary developments on these views, but note that where this is the case, proposals should be expected to demonstrate how the design has been influenced by seeking to retain these views and vistas where possible. Although they may be influenced by urbanising features and development, the principle of retaining long distance views through developments could be achieved through high quality design, appropriate building height and massing, along with the provision of open space corridors and careful street alignment. In particular, where the important views are identified towards key features these should be clarified, such that development proposals are able to respond to these and accommodate them where feasible. For example View 09 from the roundabout of Wash Road and Bridge Street, is across the River Crouch Valley to the northwest towards wooded hills at Billericay, and to the north towards Great Burstead, where the steeple of St Mary Magdalene Church forms a local landmark.</p> <p>This policy could also be refined once further detail regarding the emerging Borough Local Plan is known, reflecting the likely requirement for strategic development to be accommodated at Noak Bridge and ensure that this is delivered in a sensitive way that responds to the landscape and preserves key views as desired by the Neighbourhood Plan</p>	The draft policy already accommodates the approach set out in the representation; for example it already states that through their design, height and massing, proposals should recognise and respond positively to the various Important Views.	No change.
Woolsington One Limited c/o Eleanor Lovett – Claremont Planning Consultancy Ltd	182.	NB25 Highways, Safety and Sustainable Travel	Pg 115-116	<p>The draft Neighbourhood Plan identifies highway safety as one of the key elements of the vision, whilst one of the transport theme objectives is specifically to improve highway safety alongside ensuring that traffic volumes and speeds are managed on existing and new roads in the Plan area. Despite this, the emerging policies in the draft NP do not identify how this could be sought to be addressed by the Plan. Instead, the policy requires new development to avoid adverse impacts on road safety, rather than actively promote and support developments that help to mitigate and address existing road safety issues. There may be opportunities arising from developments where highway improvement works could help to address existing safety or capacity issues, and therefore this could be identified as a matter that could secure support for proposals.</p> <p>In respect of other matters, the draft NP identifies concerns regarding the condition of some local paths and roads, requiring maintenance and repair works. This could also represent something that developments could contribute towards in a proportionate and reasonable way.</p> <p>The draft NP identifies that additional routes to existing footpaths and new cycle paths would be welcomed. It is considered that there could be an opportunity to secure new recreational routes in the countryside to the north of Noak Bridge as part of a wider development on land north of Wash Road. The Steering Group should engage with</p>	<p>Improvements to existing safety / capacity issues rights of way etc are already addressed in some detail in the list of community aspirations at section 11.1.1 of the NP. Section 1.3.2 adds further clarity.</p> <p>Planning policies cannot require developers to address pre-existing problems with the highway network and while at a development management level, LPAs may support such an approach, that is not a matter for Neighbourhood Plan</p>	No change.

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				Woolsington One Limited in order to consider how this aspiration could be delivered as part of a wider housing development.	policies. This would be a matter for developers to seek to address through their application proposals.	
Woolsington One Limited c/o Eleanor Lovett – Claremont Planning Consultancy Ltd	183.	11 Community Aspirations	11.1.1-11.1.2 Pg 118-119	The aspirations of the draft NP are supported in principle, however it should be noted that significant levels of development would likely be required in order to deliver many of these. For example, provision of allotments or sports facilities are unlikely to be delivered in isolation, or within the confines of the existing built-up area, however could come forward as part of a largescale development on the edge of the urban area. The Steering Group should engage with promoters such as Woolsington One Limited in order to identify key priorities for infrastructure or associated developments that could come forward as part of a comprehensive masterplan as is being promoted on land to the North of Wash Road.	As noted at section 1.3.2, these are generally non-land use or pre-existing issues which are not therefore covered by policies in the NP. Respondents are welcome to engage with the community to discuss any of the matters covered in Section 11 of the NP however.	No change.
Woolsington One Limited c/o Eleanor Lovett – Claremont Planning Consultancy Ltd	184.	12 Delivery, Review and Monitoring	Pg 120-121	The final chapter of the draft NP establishes the need to monitor and review the Neighbourhood Plan to ensure that the policies remain effective. However, this section fails to recognise that the most significant consideration for the effectiveness of the Neighbourhood Plan will be the relationship with the Development Plan. As set out throughout these representations, Basildon Borough Council is at the early stages of plan preparation, following the withdrawal of the previous Local Plan in 2022. In order to ensure consistency between the layers of local policy, the preparation of the Neighbourhood Plan should be paused until the direction and spatial strategy for the Borough Local Plan becomes clear. This will ensure that the Neighbourhood Plan is aligned with the direction of strategic policy and will form a material consideration in the determination of applications for developments in the Neighbourhood Plan area going forward. Failure to do so risks the Neighbourhood Plan becoming 'out of date' as soon as the Local Plan progresses. This is particularly important given the intention for the plan period for the draft NP to align with the Local Plan. As such, in order to respond to the development needs for this emerging plan period, the Neighbourhood Plan should recognise that there may be a requirement for development to be accommodated within the Parish during the emerging plan period. Ensuring that the Neighbourhood Plan responds to this positively will enable the policies in the Plan to influence the requirements of development coming forward in the Parish, such that development can help to achieve the aspirations and address concerns identified through the Neighbourhood Plan.	The NP has been drafted to avoid the need for early review by ensuring it is broadly consistent with the emerging Local plan policies. As a general rule, the principles enshrined in the draft NP policies seek to provide a local level of detail in relation to matters of Borough or national planning policy.	No change.
Sport England	185.	General	N/A	Thank you for consulting Sport England on the above neighbourhood plan. Government planning policy, within the National Planning Policy Framework (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss	NP policy NB23 seeks to support the improvement and protection of community facilities in the Plan area, including playing fields. Policy NB24 seeks to secure funding to mitigate the impact of new development on existing	Add documentary references to the evidence base document lists where appropriate.

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				<p>of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.</p> <p>Therefore, it is essential that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 98 and 99. It is also important to be aware of Sport England's statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Playing Fields Policy and Guidance document.</p> <p>https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy</p> <p>Sport England provides guidance on developing planning policy for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded.</p> <p>https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications</p> <p>Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 99 of the NPPF, this takes the form of assessments of need and strategies for indoor and outdoor sports facilities. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.</p> <p>Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work.</p> <p>http://www.sportengland.org/planningtoolsandguidance</p> <p>If new or improved sports facilities are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes.</p> <p>http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/</p> <p>Any new housing developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities</p>	<p>services and facilities including a number of green spaces and sports pitches (see the list at Appendix 3 to the NP).</p> <p>The documentary references are helpful and will be added to the evidence base document lists where appropriate in order to direct the reader to useful source information.</p>	

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				<p>resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.</p> <p>In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how any new development, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.</p> <p>Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.</p> <p>NPPF Section 8: https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities</p> <p>PPG Health and wellbeing section: https://www.gov.uk/guidance/health-and-wellbeing</p> <p>Sport England's Active Design Guidance: https://www.sportengland.org/activedesign</p> <p><i>(Please note: this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.)</i></p>		
Suffolk County Council	186.	General	N/A	Confirms that, at this present time, has no comments to make.	Noted	N/A
Transport for London (TfL)	187.	General	N/A	Confirms that, at this present time, has no comments to make.	Noted	N/A
UK Power Networks Property & Consents Department	188.	General	N/A	No response.	N/A	N/A

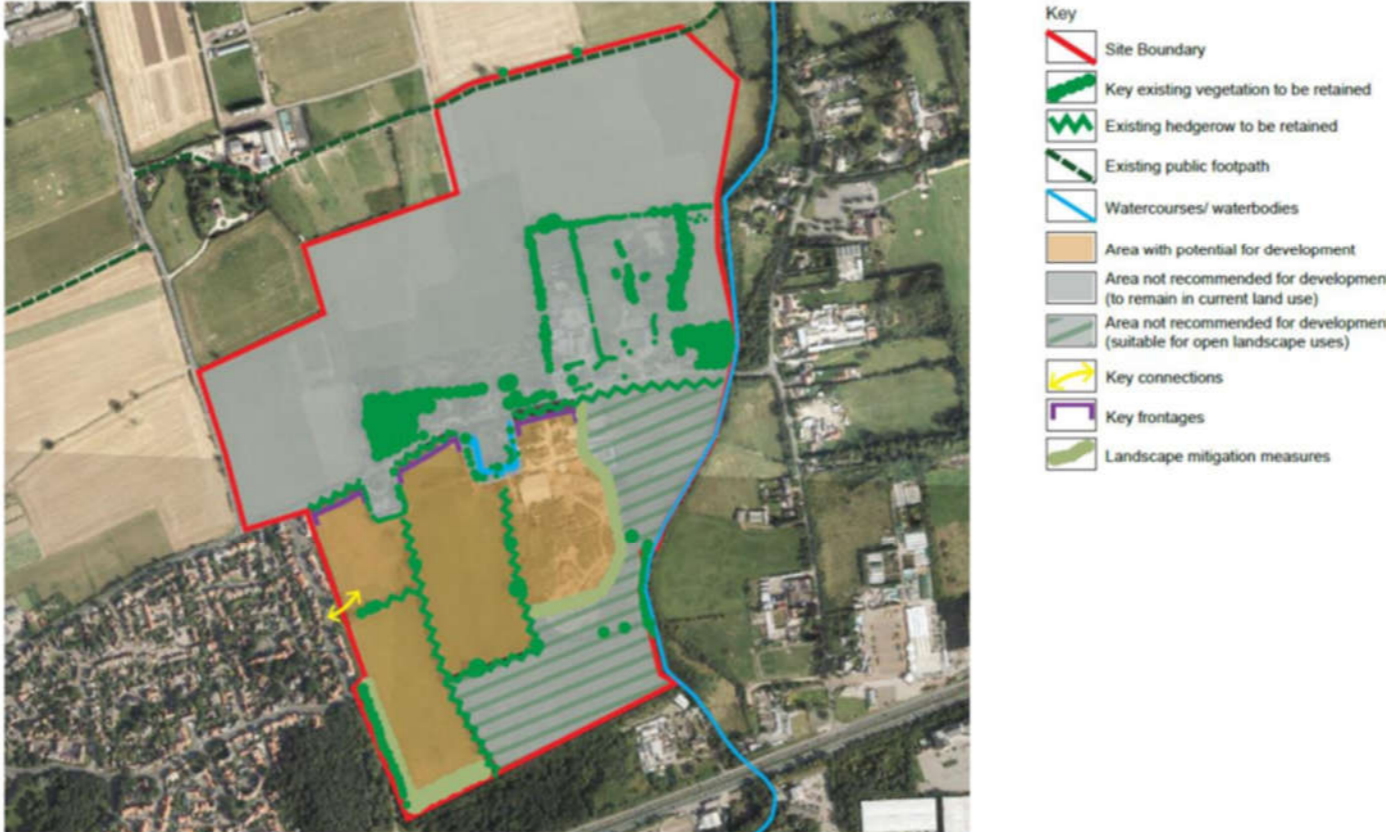
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Avison Young on behalf of National Gas Transmission	189.	General	N/A	Letter identifies no National Gas Assets within the NP area. Confirms that, at this present time, has no comments to make.	Noted	N/A
WSP on behalf of Croudace Homes	190.	General	N/A	<p>Croudace Homes are promoting 'Land East of Noak Bridge' (the Site), which had been proposed for allocated for around 400 homes under Policy H10 'Land East of Noak Bridge' of the withdrawn Draft Local Plan (Revised Publication Local Plan 2014 – 2034) in 2022.</p> <p>Croudace have held meetings with the parish which have been instrumental in shaping the emerging proposals particularly through the integration of the 'Noak Bridge Design Codes' into the planning application.</p> <p>Croudace Homes are promoting a high-quality residential scheme which will deliver both social, environmental and economic benefits for existing and future residents. The accompanying 'Appendix 1 – Noak Bridge Vision and Master Plan Document' provides a summary of the development and wider public benefits. The Vision Statement demonstrates that the scheme will retain and reinforce the site's natural boundaries, trees and other features as well as provide a layout that will preserve the openness of the Green Belt and enhance the setting of nearby Laindon Ponds (including the moated enclosure) and Daniel's Farmhouse.</p>	Noted	N/A
WSP on behalf of Croudace Homes	191.	NB11 Important Views	7.7.1-7.7.7 Figure 28 Pg 70-73	<p>Policy NB11 'Important Views' designates View 11 'Eastern views towards the Green Belt from the bus station at Eastfield Road' as a Key View and Vista. Supporting paragraph 7.7.1 states that all twenty views as shown in Figure 28:</p> <p><i>".... reflect both the character of Noak Bridge Conservation Area and the strong connection of the village with the surrounding countryside and specifically the Green Belt".</i></p> <p>Further justification is provided in paragraphs 7.7.5 and 7.7.7 which mention:</p> <p><i>"These views have been determined to be important to the local community and their protection and, where appropriate, their enhancement is considered critical, as they contribute significantly towards defining the rural character and setting of the village".</i></p> <p><i>"Similarly, the village benefits from a variety of environmental features, such as the Noak Bridge Nature Reserve to the south east, the Village Green at the centre of the Conservation Area, and the ponds dotted around the village. Views of these features are also important, as they create interesting street views and help to further reinforce the feeling of Noak Bridge being a charming traditional English village".</i></p> <p>Proposed View 11 and the land it overlooks (i.e. the Site) is not located within the boundary of Noak Bridge Conservation Area or its setting. It is important to note that the Site is not designated Local Green Space, located in or near an Area of Outstanding Natural Beauty nor does the viewpoint overlook any designated or undesignated heritage assets. View 11 has been identified as a Key View and Vista in the NBNP solely based on the views of survey respondents and without any regard to material evidence which has been prepared at the strategic level such as the Basildon Outline Landscape Appraisals of Potential Strategic Development Sites (May 2017).</p>	Noted. The view has been highlighted as important to the community. The evidence base is to be amended to show how each view has been appraised.	Amend evidence base to show how each view has been appraised.

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WSP on behalf of Croudace Homes	192.	NB11 Important Views	7.7.1-7.7.7 Figure 28 Pg 70-73	<p>Paragraph 174 (a) of the NPPF (2023) states that planning policies should contribute to and enhance the natural and local environment by:</p> <p><i>“protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan)”.</i></p> <p>In Forest of Dean District Council v Secretary of State for Communities And Local Government & Anor [2016] EWHC 2429 (Admin) it was determined that ‘valued landscape’ as defined under Paragraph 174 (a) of the NPPF (2023) must have <i>“relevant attributes sufficient to take it “out of the ordinary”</i> (paragraph 23) and that <i>“valued meant something other than popular”</i> (paragraph 14).</p> <p>Pages 259 to 261 of the Basildon Outline Landscape Appraisals of Potential Strategic Development Sites (May 2017) assessed the portion of Site 26 which lies south of the A127 (i.e. The Site) as having low landscape sensitivity. The Site was considered to have potential for housing development subject to the inclusion of a landscape buffer setting the development back from the Noak Bridge Nature Reserve (see Figure 1).</p> <p>Page 267 concludes that:</p> <p><i>“The southern end of the site between the western edge of Steeple View and the flood zone to the east has potential to be developed without causing significant adverse landscape and visual effects”.</i></p> <p><i>“Development in this location could form an appropriate extension to Noak Bridge and provide improvements to parts of the area that are currently underused. This also presents the opportunity to form a stronger edge to the Green Belt”.</i></p> <p>Neighbourhood Plans must be in general conformity with the strategic policies contained in the development plan for the area and should contribute to the achievement of sustainable development.</p>	<p>It is unclear as to the nature of the comment, however the NP will be in general conformity of the strategic policies of the Adopted Local Plan.</p> <p>It is a positively prepared plan which does not seek to stifle or limit development. Merely to protect the assets of the parish and to retain its individual character and sense of place. There are a number of areas which are considered to be worthy of important view status. Including view 11.</p> <p>In this instance, there is no reason why this could not be incorporated into any forthcoming development on the site.</p> <p>At the present time it would not be contrary to any strategic policy.</p>	No change.


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				<p>Figure 1: reproduction of figure 5 development potential on page 268</p> 																						
WSP on behalf of Croudace Homes	193.	NB11 Important Views	7.7.1-7.7.7 Figure 28, 29 Pg 70-73	<p>Footnote 8 on page 6 of the NPPF (2023) states that where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three year Or where the Council is unable to demonstrate a 5-year housing land supply then adopted Local Plan policies responsible for housing provision should be considered either absent or out-of-date.</p> <p>Table 1: Housing Delivery Test (2021) for Basildon</p> <table border="1" data-bbox="854 1545 2009 1816"> <thead> <tr> <th>Date</th> <th>Number of homes required in Basildon</th> <th>Number of homes delivered in Basildon</th> <th>Housing delivery shortfall for financial year</th> <th>Housing Delivery Test Measurement</th> <th>Housing Delivery Test Consequence</th> </tr> </thead> <tbody> <tr> <td>2018 - 19</td> <td>1076</td> <td>340</td> <td>736</td> <td rowspan="3">41%</td> <td rowspan="3">Presumption in favour of sustainable development</td> </tr> <tr> <td>2019-20</td> <td>974</td> <td>460</td> <td>514</td> </tr> <tr> <td>2020-21</td> <td>666</td> <td>317</td> <td>349</td> </tr> </tbody> </table>	Date	Number of homes required in Basildon	Number of homes delivered in Basildon	Housing delivery shortfall for financial year	Housing Delivery Test Measurement	Housing Delivery Test Consequence	2018 - 19	1076	340	736	41%	Presumption in favour of sustainable development	2019-20	974	460	514	2020-21	666	317	349	<p>The Neighbourhood Plan does not have to allocate specific sites, particularly where this may lead to issues with any current Local Plan preparation. In this regard there is no issue with prematurity, where sufficient mechanisms for review are in place.</p> <p>A yearly review at the Parish AGM or similar meeting will allow for any part of the Plan to be updated in part or whole, as necessary to reflect any change in circumstances.</p>	No change
Date	Number of homes required in Basildon	Number of homes delivered in Basildon	Housing delivery shortfall for financial year	Housing Delivery Test Measurement	Housing Delivery Test Consequence																					
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				<p>Table 1 shows that housing delivery in Basildon has been substantially below the housing requirement for the last three years.</p> <p>In two recent appeal decisions (PINS Ref: APP/V1505/W/22/3296116 on 11/11/2022 and APP/V1505/W/22/3298599 on 09/12/2022) the Planning Inspectorate confirmed that Basildon Borough Council has a housing land supply of between 1.6 and 1.89 years against the 5-year NPPF (2021) requirement. The latest Basildon Borough Council Five Year Land Supply Report 1 April 2023 to 31 March 2028 (June 2023) states that Basildon has a housing land supply of 1.85 years against the 5-year requirement.</p> <p>A Ministerial Statement made on 12 December 2016 (Statement UIN HCWS346) confirmed that where a local planning authority is unable to demonstrate a three-year supply of deliverable housing sites then the Development Plan will be deemed to be 'out-of-date' under national planning policy.</p> <p>There is significant issue of prematurity in the submission of the Neighbourhood Plan at all at this stage. By seeking to progress the Neighbourhood Plan ahead of the Council's own Development Plan process, the NBNP is leaving itself open to early obsolescence. As the Submission Draft NP acknowledges, it must demonstrate compliance with the Development Plan; in this case the Basildon District Local Plan Saved Policies (2007) are now out-of-date and provides no strategic guidance to the emerging NBNP.</p> <p>Due to the absence of strategic housing provision policies significant weight should be given to the latest evidence base i.e. the Basildon Outline Landscape Appraisals of Potential Strategic Development Sites (May 2017) when preparing the NBNP.</p>	<p>Equally, the Plan has been prepared as a result of several meetings and consultation with Basildon Council Officers to ensure conformity with existing Local Plan policies and the direction of travel for the future.</p> <p>No change is recommended.</p>	
WSP on behalf of Croudace Homes	194.	NB11 Important Views	Pg 73	We object to the inclusion of View 11 within Neighbourhood Plan Policy NB11 ' <i>Important Views</i> ' on the basis that the policy wording which states that " <i>Development proposals which would have a significant adverse impact on an identified Important View will not be supported</i> " would prejudice development coming forward on the Site. The Site was considered by the Basildon Outline Landscape Appraisals of Potential Strategic Development Sites (May 2017) as having the potential to provide land for housing to help meet the needs of the Borough and this policy would conflict with the Council's most up to date strategic evidence base.	Comments noted.	See comments above
WSP on behalf of Croudace Homes	195.	NB11 Important Views	7.7.1-7.7.7 Figure 28, 29 Pg 70-73	In the absence of up-to-date strategic policies which can provide for sufficient housing to meet the objectively assessed needs of the borough, further work on the NBNP should cease to allow Basildon Borough Council time to update the supporting evidence to the emerging Local Plan and adopt strategic policies which meets the objectively assessed housing needs of the Borough.	Comments noted.	See comments above
WSP on behalf of Croudace Homes	196.	NB11 Important Views	7.7.1-7.7.7 Figure 28, 29 Pg 70-73	<p>It should be noted that the 2021 survey results (referenced on supporting paragraph 7.7.2 of the NBNP_ which asked respondents to identify views which were of value to them would not by itself demonstrate that the landscape has the necessary attributes that would make the landscape 'valued landscape' as defined in Paragraph 174 (a) of the NPPF (2023).</p> <p>The inclusion of View 11 within Neighbourhood Plan Policy NB11 'Important Views' conflicts with policies within the NPPF (2023) and the recommendations of the Basildon Outline Landscape Appraisals of Potential Strategic Development Sites (May 2017). Both documents are primary points of reference in preparing the NBNP and due to the</p>	Comments noted.	See comments above


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				absence of strategic policies and the engagement of the presumption in favour of sustainable under paragraph 11 of the NPPF (2023) both should be given significant weight.		
WSP on behalf of Croudace Homes	197.	NB11 Important Views	7.7.1-7.7.7 Figure 28, 29 Pg 70-73	<p>Croudace Homes objects to the inclusion of View 11 in Policy NB11 'Important Views' on the basis that the adoption of the policy would be premature as it would precede the adoption of the emerging Local Plan. The adoption of Policy NB11 could prejudice development coming forward on this Site as well as reduce the number of option available to the Council in meeting future housing needs of the Borough. Due consideration must be given to Basildon's housing delivery results and current 5 year housing land supply and the need for sufficient land to meet housing needs over the Local Plan period. In the last three years delivery has been substantially below the housing requirement (see table 1) and the Five Year Land Supply Report April 2023 to 31 March 2028 (June 2023) confirms a housing land supply of 1.85 years against the 5-year requirement.</p> <p>Croudace Homes therefore request the following:</p> <p>Neighbourhood Plan Policy NB11 'Important Views': Omit View V-11 Eastern views towards the Green Belt from the bus station at Eastfield Road in Figure 28 'wider Views and Vistas within the Plan area'.</p>	Noted – no change proposed.	See comments above. No change.
WSP on behalf of Croudace Homes	198.	N10 Local Green Spaces	7.6.1-7.6.7 Figure 27 Pg 65-69	<p>Policy NB10 '<i>Local Green Spaces</i>' designates Noak Bridge Nature Reserve (LG-7) as a Local Green Space. The proposed extent of the LG7 boundary would include parcels of land which front Eastfield Road and Bridge Street (see Figure 2). Croudace Homes support the designation of Parcel C of the proposed Local Green Space as shown in Figure 2 however they strongly reject the inclusion of parcels A and B (as shown in Figure 2 below) as this would exceed the area that is managed as a nature reserve and therefore places disproportionate restrictions on this area. The inclusion of parcels A and B could prejudice any proposal for a development on parcel D and the provision of a pedestrian and emergency access from Eastfield Road to the Site.</p> <p>Figure 2: Proposed extent of LG-7</p> 	<p>The nature reserve is an important asset to the community and its future protection and enhancement is required.</p> <p>There are a number of areas where wildlife/biodiversity corridors and extension are considered essential, especially in an area which transitions from urban to rural such as this.</p> <p>Only those areas which are either of stand-alone importance or cumulatively considered to add further benefit to the Nature Reserve have been included.</p> <p>Each site has been subject to assessment through an approved methodology which has been approved by many NP Examiners across the country.</p>	No change

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				Parcel D (land registry title EX209830) is registered to JK Farms Ltd (joint promoters with Croudace Homes) and include the narrow strip along the eastern edge of parcels A and B.		
WSP on behalf of Croudace Homes	199.	N10 Local Green Spaces	7.6.1-7.6.7 Figure 27 Pg 65-69	<p>As mentioned above in Objection 1 consideration must be given to Basildon’s housing delivery results and current 5-year housing supply and the options available to Basildon Council when allocating land for housing development in the emerging Local Plan.</p> <p>Paragraph 101 and 102 of the NPPF (2023) mentions that:</p> <p><i>“Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes.... be capable of enduring beyond the end of the plan period”.</i></p> <p><i>“The Local Green Space designation should only be used where the green space is:</i></p> <ul style="list-style-type: none"> <i>a) in reasonably close proximity to the community it serves;</i> <i>b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquility or richness of its wildlife; and</i> <i>c) local in character and is not an extensive tract of land”.</i> <p>Paragraph 9 of the NPPG (2014) on Local Green Space designation states that:</p> <p><i>“Local Green Spaces may be designated where those spaces are demonstrably special to the local community, whether in a village or in a neighbourhood in a town or city”.</i></p> <p>Parcels A and B of proposed LG-7 does not meet the criteria for Local Green Space allocation as it would include land that is not part of the Nature Reserve (see figure 3) and therefore would fail to hold any particular local significance given that they do not form part of the Nature Reserve itself.</p>	Noted – no change proposed.	See comments above. No change.

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				<p>Figure 3: Extract of the withdrawn regulation 19 Local Plan Policies Map 2018</p> 		
WSP on behalf of Croudace Homes	200.	N10 Local Green Spaces	7.6.1-7.6.7 Figure 27 Pg 65-69	The allocation of parcels A and B would also be contrary to Paragraph 101 of the NPPF (2023) as it would prejudice development of parcel D and therefore would not complement investment in providing sufficient homes nor would the designation be capable of enduring beyond the end of the plan period.	Noted – no change proposed.	See comments above. No change.
WSP on behalf of Croudace Homes	201.	N10 Local Green Spaces	7.6.1-7.6.7 Figure 27 Pg 65-69	Croudace Homes therefore request the following: Omit parcels A and B from Local Green Space 7 'Noak Bridge Nature Reserve' Policy NB10 'Local Green Spaces'.	Noted – no change proposed.	See comments above. No change.