

Ongar

Town Council

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Minutes of a meeting of the Planning committee on 18th September 2024 at 7.30pm Held at the Council Offices, Bansons Way CM5 9AS

PLN109/24 Those present and apologies for absence

Chairman: Cllr Walton

Councillors: Vaz, Feetham, Eydmann, Barrell, Roberts, Gunn, Mendoza

Also present: Planning Clerk, Adriana Jones, Press officer, representative from Persimmon developers, 2 members of Ongar 3rd Scout Group, Head of The Ongar Academy, 8 members of the public

Apologies: Cllr Acornley, Cole, O'Neill

Proposed: Cllr Mendoza seconded Cllr Roberts carried unanimously.

PLN110/24 Declaration of Disclosable Pecuniary Interests

None received.

PLN111/24 Public participation

- Scouts – Can S106 money support their 'Big Build' project
- Head from Ongar Academy - If built with S106 money, will artificial pitches/MUGA court be built at the Ongar Academy.
- Members of the Marden Ash Action Group presented their objections on EPF/1356/24
- Members of the RAGON4 group stated their objections on EPF/2787/23

PLN112/24 Reports (maximum 5 minutes)

ONPCG – relevant planning matters and subcommittee – Cllr Mendoza reported that matters were ongoing.

District councillors on planning matters - a written report from Cllr Dadd was received and noted.

PLN113/24 To agree the minutes of Planning Committee meeting minutes of 15th August 2024

The minutes of the Planning committee meeting are approved as a true record.

Proposed Cllr Roberts seconded Cllr Mendoza carried unanimously.

PLN114/24 Correspondence

- For information: Proposed solar farm just off the A113 along Berwick Lane https://eppingforestdc.my.site.com/pr/s/planning-application/a0hTv0000019bNxlAI/epf154624?c_r=Arcus_BE_Public_Register&tabset-dc51c=2 – Noted
- Letters of objection to planning application EPF/1356/24
- Letters of objection to planning application EPF/2787/24

- Letters of objection to planning application EPF/1672/24
- National planning framework 24.09.24 – decision that no response from OTC needed.
- Request for S106 funding towards a new scout hut – noted.
- Correspondence from Ongar Academy – noted.

PLN115/24 To consider planning applications:

[EPF/1356/24](#) - Land known as The Paddocks, Stanford Rivers Road, Ongar
Residential development of 36 dwellings including affordable housing, access from Stanford Rivers Road, associated estate roads, parking, open space and enhanced landscaping.

Ongar Town Council **OBJECT** to this planning application as it breaches multiple policies within the Ongar Neighbourhood Plan, breaches policies contained within the EFDC local plan and OTC has additional material concerns. A detailed objection is attached to the minutes.

[EPF/2787/23](#) – Land North of Chelmsford Road, Ongar

The development of 129 dwellings with associated parking, landscaping, open space, drainage and infrastructure and the formation of pedestrian and vehicular access onto High Ongar Road (ONG.R4 – Allocated Site in Ongar) “REVISED DESCRIPTION, DOCUMENTS & PLANS”.

Ongar Town Council **OBJECT** to this planning application as it breaches multiple policies within the Ongar Neighbourhood Plan. A detailed objection is attached to the minutes.

[EPF/1480/24](#) – 21 Great Lawn, Ongar

Ground floor rear and side extensions.

No objection

[EPF/1640/24](#) – Hillside House, Drapers Corner, Ongar

Removal of existing garage and side building. Construction of side extension.

Construction of dormers and other fenestration changes.

No objection

[EPF/1672/24](#) – 23 Moreton Road, Ongar

Single storey rear extension.

No objection but request following conditions:

- Prevent the single storey extension roof from being used as a roof terrace.
- Ensure any windows overlooking neighbours to the side are opaque.
- Request additional parking be provided at the property so that it has two spaces, now it is a 2+ bedroom house (as per ONP policy CT3).

In addition OTC would like to alert EFDC that there is a sewer running through the property that is not identified on the plans OTC also support an conditions applied by EFDC regarding planning breach.

[EPF/1692/24](#) – 20 Great Lawn, Ongar

Ground floor rear extension.

No objection

[EPF/1732/24](#) – 2 Love Lane, Ongar
Single storey Rear Extension, Front Porch, 1st Floor extension above double garage.
No objection

[EPF/1136/24](#) – The Ongar Surgery, High Street, Ongar
Change of use from offices to residential. The proposed seeks extend and alter the existing building to provide 2 x 1-bedroom flats. Amended site location plan only.
Objection: It was proposed by Cllr Roberts seconded Cllr Mendoza carried unanimously to re-submit OTC's previous objections (*Objection to insufficient parking as frontage is not wide enough to accommodate several vehicles*)

FOR INFORMATION

None received.

PLN116/24 To note planning decisions

EPF/0902/24 – 218 The Cock Tavern, Ongar
Change of use of first floor function room back to living accommodation.
Approve with conditions.

EPF/0876/24 – 218 The Cock Tavern, Ongar
Grade II listed building consent to convert first floor function room back to living accommodation.
Approve with conditions.

EPF/1668/23 – 11 Woodland Way, Ongar
Application for approval of details reserved by condition 3 'External Finishes', condition 5 'Surface Water Disposal', condition 7 'EVCP' condition 8 'contamination', condition 10 'superfast broadband' and condition 11 'hard and soft landscaping'. Approve.

EPF/1009/24 – 1 Crossbow Court, Ongar
Single storey rear extension. Approve with conditions.

EPF/1236/24 – 9 Roding View, Ongar
Prior approval for the erection of a single-storey rear extension, 4.50m deep, height to eaves 3.0m and maximum height 4.0m. Not required.

EPF/1243/24 – 50 Onslow Gardens, Ongar
Erection of single storey ground floor rear extension, front porch extension and covered colonnade to side passage. Approve with conditions.

EPF/1195/24 – Essex House, 118 High Street
Prior approval for the change of use from Class E business use to 6no. dwellings (C3)
Approve with conditions.

EPF/1196/24 – Essex House, 118 High Street
Prior approval for the change of use from Class E business use to 7no. dwellings (C3)
Approve with conditions.

EPF/1221/24 – 9 Roding View, Ongar
The erection of a porch and canopy structure to the front elevation.
Approve with conditions.

EPF/1278/24 – Hillside House, Drapers Corner, Ongar
Prior approval for enlargement of the dwelling by the addition of a new first floor above the current dwelling to provide additional bedroom space. Approve with conditions.

EPF/0833/24 – 180A High Street, Ongar
Grade II listed building application for replacement of 3 x front elevation casement windows. Approve with conditions.

EPF/0753/24 – The Broadway, 163 High Street, Ongar
Grade II listed building consent for installing extraction unit as approved under EPF/0088/24. Approve.

Noted.

PLN117/24 To note enforcement appeals

PLN/123/24 – Brook Lodge, High Street, Ongar
Conversion of existing garden summerhouse into one-person studio unit as additional accommodation in connection with the existing assisted living accommodation on the site. The provision also includes the provision of a new access ramp to provide level access between the proposed studio, Brook Lodge and High Street.
OTC to submit their original objections regarding this application.

PLN118/24 Project updates

Update on s106 discussions with EFDC – Aim is to fully fund items ONG10-15 in IDP. ONG R3 s106 agreement is now available online. ONG R4, R5 and R6 s106 agreements are under discussion. OTC will request that items ONG 10-14 are put into one pool (rather than 5 separate items) to aid flexibility between projects. OTC will also request indexing back to 2020 prices (rather than present).

Update from IDP working group – Working group have identified a phased approach to s106 funding:

- a) Phase 1 – Engage with EFDC/ developers to secure s106 agreements
- b) Phase 2 – Engage with local community to understand local priorities
- c) Phase 3 – Work with local community organisations to develop bids for s106 funding, including, when OTC supports the project, helping with applications
- d) Phase 4 - Support groups in delivering projects.

Planning committee voted unanimously to approve this approach

Scouts and the Ongar Academy were reassured that when phase 2 begins, OTC will engage with them on their projects. However, until s106 funding is secured, it is premature to start discussions on specific projects.

Planning committee agreed unanimously to expand the TOR for the IDP working group to include securing s106 money and supporting s106 bids – updated TOR will be brought to next planning meeting for formal approval.

PLN119/24 Consider article 4 application or Ongar Conservation areas

Discuss whether OTC should monitor OTC's housing size mix.

Motion: OTC will record the number of bedrooms for all planning permissions granted within our boundaries, covering both new dwellings and extensions to existing dwellings.

Proposed Cllr Mendoza seconded Cllr Eydmann carried unanimously pending additional staffing resources from 1st November 2024.

PLN120/24 Review status of development sites identified in the EFDC local plan

Cllr Walton reported that there are 8 allocated sites for Ongar. One has been approved for development (with a S106 agreement already in place). 3 are in application stage with S106 agreements under negotiation. 2 are in pre-application stage (expected to be submitted in the new year) and 2 smaller sites have not yet started engagement.

PLN121/24 Matters for information

None received.

PLN122/24 Items for next agenda

Consider applying for heavy goods restriction through Ongar
Consider applying for conservation area around Greensted church
Updated TOR for IDP working group

Meeting closed at 22.41pm

Re: EPF/2787/23 - Land North of Chelmsford Road, Ongar, CM5 9LX

Proposed development of 129 dwellings with associated parking, landscaping, open space, drainage and infrastructure and the formation of pedestrian and vehicular access onto High Ongar Road (ONG.R4 - Allocated Site In Ongar). This planning application was considered at the 18th September 2024 meeting of the Ongar Town Council Planning Committee, which was open to members of the public and press, and advertised in accordance with statutory requirements. Please accept this letter as the statutory consultee response from Ongar Town Council (OTC) to the above stated planning application. Ongar Town Council OBJECT to this planning application as it breaches multiple policies within the Ongar Neighbourhood Plan, breaches policies contained within the EFDC local plan and OTC has additional material concerns. In addition, OTC ENDORSES the comments made on the revised application by ONPCG (Ongar Neighbourhood Plan Community Group) and RAGON4 (Residents Association Group ONG R4), including the individual RAGON4 reports on infrastructure, trees and flood risk. OTC will speak at the relevant planning meeting to outline our objection further. OTC's justification for each policy breach is detailed in full below, however in summary: - - - - - The mix, density and character of housing does not complement the local context or the wider existing area (ONG-RR3) Affordable housing is not tenure blind within the development (ONG-RR3) The new-build development does not complement the rural character of the Ongar Parish, or the specific character of its immediate context (ONG-ED1) The development does not preserve or enhance the setting of listed buildings (ONG ED3) The development has unacceptable adverse impact on the rural and natural environment within Ongar (ONG-ED5) The development has insufficient landscape and garden separation with existing dwellings (ONG-ED6) The planned access onto the A414 is insufficient in relation to the safety of road users and the pedestrian access plans are equally insufficient (ONG-CT3) 1 - There are material concerns relating to the calculation of SUDs, the location of SUDs and the exceedance route from SUDs. - - - The proposed 4-Wantz movement strategy is insufficient (EFDC local plan site-specific requirement). As demonstrated throughout our comments, reports commissioned by the developers are routinely inaccurate and/or misleading. These need to be re-commissioned and updated prior to consideration of this planning proposal OTC are requesting s106 funding relating to the impact of this development on local infrastructure. Ongar adopted the Ongar Neighbourhood Plan (ONP) in 2022 via local referendum. In law (Planning and Compulsory Purchases Act 2004, s38), a neighbourhood plan attains the same legal status as the local plan. The breaches of ONP policy outlined above are therefore sufficient grounds to reject this application. For clarity, OTC is not opposed to development at this site. We accept its inclusion within the EFDC local plan and accept that a significant number of houses will be built at this location. However, the development as currently proposed, for the reasons outlined above and below, constitutes inappropriate development which is unacceptable to Ongar Town Council. When proposals, which comply with ONP and EFDC policy, are submitted by developers, OTC will support such proposals. Our support for the recent planning application at allocated site ONG R5 'Land at Greenstead Road' is a good example of OTC's approach to supporting appropriate development which complies with local policy. ONP Policy ONG-RR3 - - The mix, density and character of housing does not complement the local context or the wider existing area Affordable housing is not tenure blind within the development This policy states "The mix of accommodation.... Must reflect the latest evidence of local need". The development currently proposes 54% 3+ bedroom dwellings, 25% 2-bedroom dwellings and 21% 1-bedroom dwellings. Ongar's latest Strategic Housing Mix Assessment has identified a need for approx 70% 3+ bedroom dwellings, 20% 2-bedroom dwellings and 10% 1-bedroom dwellings. This housing mix, at a similar edge of settlement location, was previous upheld by the Greenstead Road Appeal inspector (APP-13203). To be compliant with this policy, revised plans with additional 3+ bedroom dwellings, and fewer 1 and 2-bedroom dwellings needs to be submitted. ONP Policy ONG-RR3 also states "The mix, density and character of housing should complement the local context and wider existing area, including.....Lower density and larger accommodation with front and rear gardens, at edge of settlement and in the more rural parts of the civil parish." This development site, having previously been green-belt

agricultural land, is classed as an edge of settlement location. Ongar is a historic rural town with a prevailing housing density of around 24dph. The proposed developments housing density is significantly above the prevailing density of 24dph – although a formal estimate is not possible by OTC (the net developable area 2 [i.e. site size less SUDs] is not provided within this application), OTC estimates that it is at least 32dph. ONP-RR3 clearly states that housing density should complement the local context, and lower density should be considered at edge of settlement locations. The developers have not given due consideration to this policy and should re-submit plans for a housing density around 24dph when calculated using the ‘developable’ area. The developers also propose 11 * 2-bedroom and 27 * 1-bedroom apartments without gardens. This is in clear breach of the above policy which states that dwellings should have ‘front and rear gardens’ in edge of settlement locations. In addition, it contravenes EFDC’s Housing Mix Planning Guidance Note which indicates that flats are not appropriate until densities of 60dph are reached. These proposed apartment blocks should be removed and replaced with 1- and 2 bedroom maisonettes with gardens. ONP Policy ONG-RR3 states “affordable housing...should be provided as an integral part of each development and be tenure blind”. The current proposals have massed affordable housing in the southern aspect of the site, reserving countryside views for private accommodation, in breach of the above policy. ONP Policy ONG-ED1 - The new-build development does not complement the rural character of the Ongar Parish, or the specific character of its immediate context This policy states “New-build development...must complement the rural character of the Ongar Parish and the specific character of the immediate context...this includes: a) Complementing the existing rural ‘townscape’ character in terms of height, scale, massing, and degree of set back of building frontages from the road in accordance as to whether the development is in the town centre of Chipping Ongar... (or)...edge of settlement ” Current proposals have sited block E significantly in front of current building frontages along the A414. In addition, the design and size of this block does not complement the existing properties that line the A414 which are all grand family homes, including the listed building ‘Wantz Farmhouse’. This block should either be moved back from the road or removed entirely from proposals. Block A and B appear as imposing apartment blocks with the appearance of a 3-storey building. There are no other similar 3-storey buildings in the immediate context of the development and this design does not reflect the edge of settlement location. Please also see the above comments about the suitability of apartment blocks in this location. These 3 storey apartment blocks should be scaled back to 2 storey maisonettes. Whilst the developers have addressed some concerns around the urbanised design, and grid like road structure, of their previous proposals, OTC do not feel that this goes far enough in addressing these concerns. It is our view that the proposals still do not reflect either the design of similar developments within Ongar, or the site’s edge of settlement location. We would urge a shift away from a linear grid-like road structure. 3 ONP Policy ONG-ED3 - The development does not preserve or enhance the setting of listed buildings (ONG ED3) This policy states “Development affecting the setting of listed buildings must preserve or enhance that setting”. Wantz Farmhouse is a grade II listed building abutting the development. In addition, the neighbouring property ‘The Barn’ should also be considered as having historical merit as it stood within the curtilage of Wantz Farmhouse when the Farmhouse was listed, and as such should be afforded the same respect and protections. Current plans contain an insufficient buffer between ‘The Barn’ and proposed dwelling 87 with only around 1-2m proposed between the physical dwelling 87 and ‘The Barn’s’ garden. The Barn would, historically, have served the agricultural land that is being developed and its connection to this land is completely lost within these proposals. In addition, as described above, the proposed block E sits in front of the current line of properties on the A414 and is out of character in terms of appearance with these properties. This unacceptably alters the view and setting of ‘Wantz Farmhouse’. Block E should therefore be removed. ONP Policy ONG ED-5 - The development has unacceptable adverse impact on the rural and natural environment within Ongar This policy states “Development must enhance or have no unacceptable adverse impact on the rural and natural environment of Ongar” The Arboricultural Impact Assessment submitted by the developers is woefully inadequate. As RAGON 4’s Tree Report identifies in detail, it has failed to include 150 trees that either sit within the site or have root protection areas that fall within the site. Eight of these have subsequently

been awarded TPO status. By excluding these trees from consideration, the developers have not given due consideration to the environmental impact of this development. Prior to considering the application, the developers must re-submit an updated and complete Arboricultural Impact Assessment. OTC also share the concerns of EFDC's Tree and Landscape team – building drainage within the root-protection area of a TPO'ed tree is completely unacceptable. This drainage system must be re-routed. The developers Biodiversity Net Gain report claims that the site will improve biodiversity by 1%. Current policy states that biodiversity should be improved by 10%, so this is considered an inadequate improvement. In addition, the report has not included the 150 trees stated above and has taken credit for planting new hedgerows which are already in situ (please see RAGON 4 comments for full details). As a result, OTC has serious doubts that a BNG of 1% will be achieved and instead there will be a loss of biodiversity within this development as a result – this is in clear breach of planning policy. The developers have also not included a lighting plan or a lighting impact assessment and so have not assessed the impact of their proposals on local wildlife. ONP Policy ONG ED-5 clearly 4 states that developers should ensure “that any external lighting avoids illumination of wildlife habitats”. To be compliant with this policy, OTC request a lighting plan and impact assessment is submitted by the developers prior to EFDC considering the application. ONP Policy ONG-ED6 - The development has insufficient landscape and garden separation with existing dwellings This policy states “Development that flanks existing housing must include sufficient landscape or garden separation to protect the amenities of the occupiers of that housing” The current proposals breach this policy in several locations, impacting current residents right to privacy and amenities, namely: - - - - The position of Block C overlooking the property ‘White Gates’ Dwelling no 87,88,89 overlooking properties ‘The Barn’ and ‘Tudor Grove’. Please also note above concerns re the historical significance of ‘The Barn’. Dwelling no 95&107 overlooking 12 Fyfield Road Dwelling no 115 overlooking 43 The Gables, note that this lack of buffer also prevents a true wild-life corridor from being created at this location. Dwelling no 37/38 at 2.5 stories will have third floor dormer windows overlooking ‘Ashcroft’ These proposals need to be re-designed with sufficient buffers to protect the residents mentioned above. ONP Policy ONG-CT3 - The planned access onto the A414 is insufficient in relation to the safety of road users and the pedestrian access plans are equally insufficient This policy states that developments must ensure “sites are served by adequate roads and footways with particular regard to traffic capacity and pedestrian safety”. Essex police have lodged concerns that the proposed 40mph speed limit at the junction between the A414 and the development is insufficient and should be reduced to 30mph with a lead in 40mph speed limit around Mulberry house. OTC supports this proposal and agrees with their analysis. RAGON 4 and ONPCG have highlighted concerns that the current proposed junction between the A414 and the development site is, in its current design, unsafe. OTC supports these concerns. Our local knowledge agrees with their analysis that it is currently exceptionally difficult to exit and turn right from this junction. The addition of a right-hand lane turning on the A414, whilst necessary, will create a second lane that drivers will need to cross to turn right from the development, adding to the risk at this junction. In addition, it currently takes around 5 minutes to find a suitable break in traffic to exit at this junction. With increased traffic, this will worsen delays and will increase the risk that individuals will become impatient and take unnecessary risks, turning right with insufficient breaks in the traffic. RAGON 4 and ONPCG detail these concerns further and OTC is in full support of their analysis and endorses their proposals for traffic lights at this location which are only triggered by the presence of traffic exiting High Ongar 5 Road. OTC is of the view that this proposal will balance the need to maintain flow on the A414 with the need to maintain safety on exiting the development. Current pedestrian management proposals require pedestrians to leave the site to the south and walk along the A414 towards the Four Wantz to access local facilities within Shelley such as the school, shops, leisure centre and health centre. These current plans would encourage unnecessary car journeys and reduce the sustainability of the site. However, there is currently a proposed footpath heading north from the development towards The Gables which is unfortunately a dead end. There is potential for this path to be redirected behind The Gables, towards the leisure centre, although this would require permission from the school. We would urge the developers to explore this option so that a safe, sustainable

pedestrian route to the school, leisure centre, health centre and local shops could be created. Sports England, in their comments, suggest that a gate is inserted between the school land and the development so that balls can easily be retrieved. OTC has concerns about the safeguarding risks that such a gate would pose and urge that developers liaise with the school prior to designing this gate to ensure that these concerns are alleviated. OTC is also concerned that a proposed cycle access, past Blocks C, D and E, onto the A414 is currently unsafe for cyclists as there is no safe route for cyclists to join the A414 at this location. Material concern: Drainage - There are material concerns relating to the calculation of SUDs, the location of SUDs and the exceedance route from SUDs. Environmental Protection & Drainage and Essex SUDs have raised concerns around a miscalculation of SUDs, OTC supports their analysis. ONPCG and RAGON 4 have also raised concerns around current drainage plans, OTC also endorses these comments. In addition, OTC is concerned that the current location of SUDs sits around 1m higher than the back garden of 1 Vale Cottages and that the proposed SUDs will risk flooding at this property. The SUDs exceedance has also been directed towards surface water drainage along High Ongar Road. This road currently regularly floods, and OTC is concerned that current plans will add more surface water at this location, increasing the frequency of flooding and the severity of floods when they do occur. EFDC Site Specific Requirement - 4-Wantz Movement Strategy - The proposed 4-Wantz movement strategy is insufficient. It is a site-specific requirement that this movement strategy is agreed prior to planning permission being granted. In its current form the movement strategy is inadequate for the following reasons: - - Vehicular access from ONG R4 onto A414 is unsafe, and proposed speed limits for that section of road inappropriate (see above comments) The movement strategy necessitates moving the bus stop further south on the high street. There would be no layby at this location, resulting in disruption to the flow of traffic along the high street onto the 4-Wantz roundabout. 6 - The proposals plan to remove the right-hand turn lane into Walter Mead Close, again disrupting the flow of traffic along the A414 from the 4-Wantz roundabout and creating potential safety concerns for cars turning into the close. - - - - - The traffic surveys upon which the movement strategy is based were performed in 2021, when traffic levels had not returned to normal levels post-pandemic, they risk underestimating traffic flows at this site. These surveys should be re-performed to ensure their veracity. There are concerns that the lengthening of splitter islands will encourage pedestrians to cross at unsafe points. There are concerns that the increased flare lengths are not sufficient and will not aid the proposed reduction in congestion. Moving guard railings will narrow footpaths which are already inhibited by foliage. This will make it difficult to pass these footways with prams or by wheelchair. There is no inclusion of new 30mph gate features on the entrance to Ongar from either direction on the A414 – these would aid speed management in the area. There are inadequate plans as to the cycling connection between sites. There has been no engagement with OTC on the above movement strategy until its inclusion in this planning application. We would encourage the developers of ONG R1, R2 and R4 to engage with OTC on this strategy and then resubmit a revised version taking into account the above points. This would need to occur prior to planning approval of developments R1, R2 or R4 (this development). Section 106 agreements - OTC are requesting s106 funding relating to the impact of this development on local infrastructure. Within the EFDC Local Plan, Ongar has been allocated a total of eight development sites constituting 590 new homes, this is expected to increase Ongar's population by around one third. Site ONG R4 constitutes around 22% of this proposed development. This level of development will place an unacceptable strain on Ongar's local infrastructure and, in order to make this development acceptable, Ongar Town Council requests a capital contribution from the developers to facilitate delivery of Ongar's infrastructure needs. EFDC's 'Infrastructure Delivery Plan' outlines the infrastructure requirements needed to accommodate the proposed developments within Ongar (items ONG 1-15 within the infrastructure delivery schedule). Ongar Neighbourhood Plan Policy ONG CT4 also identifies the infrastructure priorities for Ongar. When making this s106 agreement, OTC request that all figures are index linked retrospectively to when they were published in 2020, and not from when the agreement is signed. In addition, OTC would support grouping the 'Open Space and Green Infrastructure' items (Ong 10-14) into one larger, more flexible pool, rather than specifying each item individually. This will allow greater flexibility when spending the funds if the overall target amounts are

not achieved, enabling some items to be delivered in full rather than all items being partially delivered. In addition, this will also smooth the transition to CIL when/if a CIL is introduced within the district. Please note, that OTC would still expect the same overall level of contribution to this pool, but would prefer the wording to enable greater flexibility between 'open space and green infrastructure' items. 7 OTC also note that, despite the presence of items ONG-6 and ONG-7 within the IDP, ECC Infrastructure have not requested s106 contributions for primary or secondary school places. Whilst we understand that there are currently enough school places to absorb an individual sites additional population, we are concerned that when all 590 proposed homes are considered collectively, this would no longer be the case. ECC appears to be assessing each development individually, without assessing the combined impact of all 8 allocated sites. We would urge further conversations between the case officer, ECC infrastructure and the local schools (in particular the Ongar Academy) prior to the section 106 agreement being finalised. This is to ensure that the developments true impact on school places is reflected within this agreement. Until a s106 agreement is in place which addresses Ongar's infrastructure needs, this development constitutes a scale that would place unacceptable pressures on Ongar's current infrastructure and so the development should be refused on this basis. Conclusion In summary, Ongar Town Council requests that, prior to this planning application being considered, a new Arboricultural Impact Assessment, an updated Biodiversity Net Gain report, a revised traffic survey, a lighting plan, and a lighting impact assessment are submitted for consideration. In addition, an updated 4-Wantz movement strategy should also be submitted prior to consideration of this application. When EFDC consider this application, Ongar Town Council urge that the current plans are REJECTED as they contravene a multitude of policies within the Ongar Neighbourhood Plan. These breaches, set out above, are so numerous and severe that merely altering current plans is unlikely to render them acceptable. Instead, the developers should resubmit significantly revised plans that respect local policy, respect Ongar's rural setting and historic context, respect the development sites edge of settlement location, respect Ongar's local ecology, ensure road, pedestrian and cycle safety, ensure appropriate drainage plans, and respect the right to privacy of Ongar's existing residents. Finally, if this application is approved, then Ongar Town Council requests that EFDC enter into a section 106 agreement with the developers to mitigate the impact of this development on Ongar's wider infrastructure. OTC also request that EFDC actively involves and / or consults OTC on these conversations with developers.

Re: EPF/1356/24 - Land known as The Paddocks, Stanford Rivers Road, Ongar

Residential development of 36 dwellings including affordable housing, access from Stanford Rivers Road, associated estate roads, parking, open space and enhanced landscaping. This planning application was considered at the 18th September 2024 meeting of the Ongar Town Council Planning Committee, which was open to members of the public and press, and advertised in accordance with statutory requirements. Please accept this letter as the statutory consultee response from Ongar Town Council (OTC) to the above stated planning application. Ongar Town Council OBJECT to this planning application as it breaches multiple policies within the Ongar Neighbourhood Plan, breaches policies contained within the EFDC local plan and OTC has additional material concerns. OTC will speak at the relevant planning meeting to outline our objection further. OTC's justification for each policy breach is detailed in full below, however in summary: - - - - - The density and character of housing does not complement the local context or the wider existing area (ONG-RR3) Affordable housing is not tenure blind within the development (ONG-RR3) The new-build development does not complement the rural character of the Ongar Parish, or the specific character of its immediate context (ONG-ED1) The development does not preserve or enhance the setting of listed buildings (ONG ED3) The development has unacceptable adverse impact on the rural and natural environment within Ongar (ONG-ED5) The development has insufficient landscape and garden separation with existing dwellings (ONG-ED6) The planned access onto the A113 is insufficient in relation to the safety of road users and the pedestrian access plans are equally insufficient (ONG-CT3) There is insufficient visitor parking (ONG-CT3) There are material concerns relating to the calculation of SUDs, the location of SUDs and the exceedance route from SUDs.

1 - - As demonstrated throughout our comments, reports commissioned by the developers are routinely inaccurate and/or misleading. These need to be re-commissioned and updated prior to consideration of this planning proposal OTC are requesting s106 funding relating to the impact of this development on local infrastructure. Ongar adopted the Ongar Neighbourhood Plan (ONP) in 2022 via local referendum. In law (Planning and Compulsory Purchases Act 2004, s38), a neighbourhood plan attains the same legal status as the local plan. The breaches of ONP policy outlined above are therefore sufficient grounds to reject this application. For clarity, OTC is not opposed to development at this site. We accept its inclusion within the EFDC local plan and accept that houses will be built at this location. However, the development as currently proposed, for the reasons outlined above and below, constitutes inappropriate development which is unacceptable to Ongar Town Council. When proposals, which comply with ONP and EFDC policy, are submitted by developers, OTC will support such proposals. Our support for the recent planning application at allocated site ONG-R5 'Land at Greenstead Road' is a good example of OTC's approach to supporting appropriate development which complies with local policy.

ONP Policy ONG-RR3 - - The density and character of housing does not complement the local context or the wider existing area Affordable housing is not tenure blind within the development This policy states "The mix, density and character of housing should complement the local context and wider existing area, including.....Lower density and larger accommodation with front and rear gardens, at edge of settlement and in the more rural parts of the civil parish." The development site was previously green-belt land, having previously been used as paddocks. It sits on the very edge of Marden Ash, one of Ongar's constituent villages and comes at the end of a long row of large family homes with large gardens. The site is therefore classed as an edge of settlement location. Within part two of the EFDC local plan, 'site specific policy requirements', EFDC estimated that the indicative developable area was 1.5Ha. With an indicative net density of 25, this provided a net capacity of 33 dwellings. Within the 'Accommodation schedule', the developers, after further surveys, state that the 'net developable area' is 1.05Ha. At an indicative net density of 25, this would suggest that the site is suitable for 26 dwellings. The developers are proposing 36 dwellings, at a density of 34dph, which constitutes overdevelopment of the land. Furthermore, ONP Policy ONG-RR3 identifies that Ongar's prevailing density is 24dph and, as an edge of settlement site, it would be expected that there would be 'lower density and larger accommodation'. This suggests that the true number of dwellings should in fact be fewer than 25 and current proposals are in breach of this policy. The developers also propose 14 * 1-bedroom apartments without gardens. This is in clear breach of the above policy which states that dwellings should have

'front and rear gardens' in edge of settlement locations. In addition, it contravenes EFDC's Housing Mix Planning 2 Guidance Note which indicates that flats are not appropriate until densities of 60dph are reached. These proposed apartment blocks should be removed and replaced with 1- bedroom maisonettes with gardens, as befits the surrounding setting. ONP Policy ONG-RR3 states "affordable housing...should be provided as an integral part of each development and be tenure blind". The current proposals have massed affordable housing in the western corner of the site, this massing is also in breach of the above policy. ONP Policy ONG-ED1 - The new-build development does not complement the rural character of the Ongar Parish, or the specific character of its immediate context This policy states "New-build development...must complement the rural character of the Ongar Parish and the specific character of the immediate context...this includes: a) Complementing the existing rural 'townscape' character in terms of height, scale, massing, and degree of set back of building frontages from the road in accordance as to whether the development is in the town centre of Chipping Ongar... (or)...edge of settlement " As stated above, this development site is an edge of settlement site, sitting at the end of a row of large family homes with sizeable gardens. It is sited opposite the grade II* listed building, 'Marden Ash House' and next to the grade II listed building, 'Dyers'. The site will serve as the 'gateway' to Ongar when approaching along the A113. The current plans, as described above, constitute over-development which is completely out of keeping with the sites immediate context and does not complement the existing rural 'townscape'. It is therefore in clear breach of the above policy. In addition, the design of properties is repetitive and uniform in design with little individual character, their design does not complement either 'Dyers' or 'Marden Ash House' which are the neighbouring properties. It therefore neither complements the rural character of Ongar or the specific character of its immediate context. ONP Policy ONG-ED3 and ONG-ED6 - - The development does not preserve or enhance the setting of listed buildings (ONG ED3) The development has insufficient landscape and garden separation with existing dwellings (ONG-ED6) Policy ED3 states "Development affecting the setting of listed buildings must preserve or enhance that setting". In addition, policy ED6 states "Development that flanks existing housing must include sufficient landscape or garden separation to protect the amenities of the occupiers of that housing". 'Dyers' is a grade II listed building which abuts the northern edge of the site. As you drive into Ongar, it is one of the first views of the town and sets the context for entry into our historic settlement. The development proposals currently include a 0.1Ha buffer 'orchard' between 3 Dyers and the development with the aim of reducing the impact of the development on this historic building. OTC considers this buffer to be inadequate as the new development will still impact the setting of 'Dyers' and request that this buffer is increased in size and extended further along the boundary of Dyers. In addition, properties 1-5 abut the boundary of 'Dyers' with an insufficient separation between the garden of Dyers and these properties. OTC requests an extension of the garden size at this point to further mitigate the impact on Dyers. Finally, as described above in ONG-ED1, the current property design does not complement the listed buildings they will co-exist with. OTC requests that these designs are re-worked to include features found throughout neighbouring properties such as bay windows and other unique features. ONP Policy ONG ED-5 - The development has unacceptable adverse impact on the rural and natural environment within Ongar This policy states "Development must enhance or have no unacceptable adverse impact on the rural and natural environment of Ongar" OTC acknowledge the EFDC Tree Report, and shares the concern that buildings are too close to trees with TPO's, which will inhibit their future growth. In addition, OTC object to footpaths being built on the root protection area of TPO trees, in particular over TPO-3 (TPO/EPF/14/24). OTC also note the ECC Ecology report stating that there is evidence of the presence of the Hazel Dormouse on site, OTC understand that this is the first time that this species has been evidenced to be present in Ongar. OTC agrees with ECC Ecology's objection that there is insufficient mitigation in place to protect this habitat and OTC are concerned that the current development proposals risk destroying the habitat of a vulnerable, protected species preventing it from being established within Ongar. OTC request that appropriate mitigation measures are outlined prior to approval being granted. The developers have not submitted a lighting plan or a lighting impact assessment. Given the confirmed presence of bats on the site, OTC is concerned that the impact of the

development on this species, and their migratory patterns, has not been fully assessed and request that these reports are commissioned and received prior to EFDC considering the proposals. OTC would also request a planning condition that newbuild properties contain bat boxes and hedgehog highways to mitigate the ecological impact of this development. Finally, OTC is concerned that the submitted Ecological Impact Assessment is incomplete. It makes no mention of the following species which have been noted in the vicinity of the development site: Deers, Foxes, Birds of Prey (e.g. Kite and Barn Owl), woodpeckers, heron and cuckoos. OTC therefore request that prior to considering the proposal, the developers update their Ecological Impact Assessment to include these species. ONP Policy ONG-CT3 - - The planned access onto the A113 is insufficient in relation to the safety of road users and the pedestrian access plans are equally insufficient There is insufficient visitor parking 4 This policy states that developments must ensure "sites are served by adequate roads and footways with particular regard to traffic capacity and pedestrian safety". Vehicular access The proposed access to the development site sits on a bend of the A113. The commissioned traffic statement notes that average speeds are around 37mph, despite current 30mph restrictions. In addition, it notes that maximum speeds regularly top 60mph, and even contains a case of an individual going at more than 100mph. Speeding at the site of access is therefore well documented. Local residents also report that there are regular accidents at this site with cars speeding when leaving Ongar and then coming off the road into the ditch. These accidents are often not reported to the local police as they involve only 1 car which drives off unnoticed. As a result, these accidents don't appear on 'Crash map' or other similar sites. Local residents have provided photographic evidence to EFDC of these accidents, which OTC has also verified. The submitted traffic statement underestimates the number of trips that will result from this development site. The site uses comparison data from Bradford, Worthing and Bognor Regis – these are all urban locations with train stations, well-connected public transport links and local employment opportunities. Ongar is a rural town, with no functioning train station, is poorly connected in terms of public transport links and has few local employment opportunities. Ongar's car usage is therefore higher than these comparator sites and it is expected that 36 dwellings will result in far more than the reports predicted trip generation. The traffic statement also fails to mention the turning into Marden Ash Mews which sits opposite the site entrance, this will introduce additional risk to both current residents and new inhabitants. Given the above circumstances, there are real local concerns that introducing a new access road at this site, without additional measures, will be unsafe for new residents. There is a risk that cars slowing to turn into the development will be rear-ended by speeding cars coming up from behind. Similarly, there is concern that cars leaving the site will be T-boned by speeding cars that they can't see due to poor visibility from the access site. Ongar Town Council is therefore requesting that additional traffic calming measures are put in place, ideally a mini roundabout. Failing that, traffic lights, priority road narrowing's and gateway signs at the entrance to Ongar could be considered as an alternative solution. Pedestrian access The current proposed pedestrian footpath along the A113 is insufficient in its design. Plans show the path narrowing to 90cm, this is insufficient for prams and wheelchairs to safely pass. In addition, there is currently a telegraph pole and a 30mph road sign (currently knocked down) that sits in the centre of the proposed footpath, but there are no proposals to move these obstructions. These pedestrian access plans need to be revised to ensure that disabled users, and parents, can safely use them. The proposed dropped curb crossing across the A113 is also at a point with poor visibility and cars travelling at speed. This poses a significant pedestrian risk and OTC requests a more visible crossing, such as a pelican crossing. 5 Parking ONP ONG-CT3 also states "Providing sufficient off-street parking facilities to support the higher levels of car ownership in Ongar as a primarily rural area, including multiple car households, by using Essex Parking Standards 2009". According to the Essex Parking Standards, the site should allocate 0.25 visitor spaces per dwelling. For this site that would equate to 9 visitor spaces (36*0.25). Current proposals only identify 5 visitor parking spaces, in breach of this policy. Material concern: Drainage - There are material concerns relating to the calculation of SUDs, the location of SUDs and the exceedance route from SUDs. OTC supports the holding objection from ECC SUDs who have concerns about current drainage calculations. OTC notes that that the currently proposed SUDs sit on higher ground than the southern corner of the

development site, placing proposed dwellings 14,15 and 16 at risk of flooding. OTC also notes that the proposed SUDs exceedance route runs across allocated site ONG R7, but to the best of OTC's knowledge, there is currently no agreement with the landowner to build on, or access, this site. OTC therefore have concerns about the deliverability of this drainage plan. Taking the above combined, OTC considers the current drainage plans to be ill thought through and insufficient. OTC urge that revised plans are resubmitted prior to EFDC considering this application. Section 106 agreements - OTC are requesting s106 funding relating to the impact of this development on local infrastructure. Within the EFDC Local Plan, Ongar has been allocated a total of eight development sites constituting 590 new homes, this is expected to increase Ongar's population by around one third. This level of development will place an unacceptable strain on Ongar's local infrastructure and, in order to make this development acceptable, Ongar Town Council requests a capital contribution from the developers to facilitate delivery of Ongar's infrastructure needs. EFDC's 'Infrastructure Delivery Plan' outlines the infrastructure requirements needed to accommodate the proposed developments within Ongar (items ONG 1-15 within the infrastructure delivery schedule). Ongar Neighbourhood Plan Policy ONG CT4 also identifies the infrastructure priorities for Ongar. When making this s106 agreement, OTC request that all figures are index linked retrospectively to when they were published in 2020, and not from when the agreement is signed. In addition, OTC would support grouping the 'Open Space and Green Infrastructure' items (Ong 10-14) into one larger, more flexible pool, rather than specifying each item individually. This will allow greater flexibility when spending the funds if the overall target amounts are not achieved, enabling some items to be delivered in full rather than all items being partially delivered. In addition, this will also smooth the transition to CIL when/if a CIL is introduced within the district. Please note, that OTC would still expect the same overall level of contribution to this pool but would prefer the wording to enable greater flexibility between 'open space and green infrastructure' items. OTC also note that, despite the presence of items ONG-6 and ONG-7 within the IDP, ECC Infrastructure have not requested s106 contributions for primary or secondary school places. Whilst we understand that there are currently enough school places to absorb an individual sites additional population, we are concerned that when all 590 proposed homes are considered collectively, this would no longer be the case. ECC appears to be assessing each development individually, without assessing the combined impact of all 8 allocated sites. We would urge further conversations between the case officer, ECC infrastructure and the local schools (in particular the Ongar Academy) prior to the section 106 agreement being finalised. This is to ensure that the development's true impact on school places is reflected within this agreement. Until a s106 agreement is in place which addresses Ongar's infrastructure needs, this development constitutes a scale that would place unacceptable pressures on Ongar's current infrastructure and so the development should be refused on this basis. Conclusion In summary, Ongar Town Council requests that, prior to this planning application being considered, a new Ecological Impact Assessment, a revised traffic survey, a revised drainage plan, a lighting plan, and a lighting impact assessment are submitted for consideration. When EFDC consider this application, Ongar Town Council urge that the current plans are REJECTED as they contravene a multitude of policies within the Ongar Neighbourhood Plan. These breaches, set out above, are so numerous and severe that merely altering current plans is unlikely to render them acceptable. Instead, the developers should resubmit significantly revised plans that respect local policy, respect Ongar's rural setting and historic context, respect the development sites edge of settlement location, respect Ongar's local ecology, ensure road, and pedestrian safety, ensure appropriate parking and drainage plans, and respect the right to privacy of Ongar's existing residents. Finally, if this application is approved, then Ongar Town Council requests that EFDC enter into a section 106 agreement with the developers to mitigate the impact of this development on Ongar's wider infrastructure. OTC also request that EFDC actively involves and/ or consults OTC on these conversations with developers.