

Ongar

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Sukhvinder Dhadwar
Planning Department
EFDC
323 High Road
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Sent via email: appcomment@eppingforestdc.gov.uk
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28 January 2026

Dear Sukhvinder

Re: EPF/2427/25 - Outline planning application for mixed use redevelopment of Site 1 (Phase 1) comprising retention of the listed stable block, the demolition of all other buildings on site, the erection of up to 47 no. residential dwellings and up to 275 sqm of commercial floorspace for retail (Class E(a), or surgery Class E (e) or public house (sui generis) use together with associated provision of car parking, hard and soft landscaping, and green space, with all matters reserved apart from access.

This application was considered at the Ongar Town Council Planning Committee meeting held on 22 January 2026. Please accept this letter as the statutory consultee response from Ongar Town Council (OTC) to the above stated planning application.

Whilst this response relates specifically to EPF/2427/25, there are clearly correlations between this application and EPF/2429/25, where some of the same matters of shared concern overlap, such as access, infrastructure and drainage. OTC expects EFDC to consider matters of shared nature collectively taking both applications into consideration.

OTC would also like it noted that there has been no prior engagement by the applicant or their agents with the community, OTC, or the Ongar Neighbourhood Plan Steering Group regarding this application.

OTC **OBJECTS** to this application for the following reasons:

Objection 1 – Speculative Application based on 5 year land supply argument

This site is not included in within the EFDC Adopted Local Plan as an allocated development site, and is thus viewed as a speculative application. The applicant has challenged EFDCs published position stating they believe EFDC is unable to demonstrate a 5 year land supply, that EFDC has failed the Housing Delivery Test (HDT), and as such paragraph 11(d) of the NPPF is engaged in terms of the presumption in favour of sustainable development and thus a Grey Belt argument applies to the proposed site.

Firstly, OTC fully supports EFDCs latest published position which confirms it has a 6.57 year housing land supply, with a current HDT figure of 75.3%. This HDT figure triggers only the first two consequences set out in Paragraph 79 of the NPPF, and as such the third consequence of presumption in favour of sustainable development does not apply. EFDC has, in accordance with the requirements of Paragraph 79, published an Action Plan to assess the causes of under-delivery and identify actions to increase delivery in future years.

Secondly, whilst it is understood EFDC is in the process of conducting a Green Belt review which may or may not identify potential Grey Belt sites, at this stage the site is within the Green Belt, has not been classified as Grey Belt (see objection 2 below), and therefore Green Belt policies apply.

Thirdly, Planning Practice Guidance (Ref 64-014-20250225) makes it clear that just because a site 'may potentially' be classified as Grey Belt, it does not automatically follow that it should be allocated for development, released from the Green Belt, or for development proposals to be approved in all circumstances. The Guidance states that planning proposals should be informed by an overall application of the policies in the NPPF. The applicants HDT document fails to address this, relying simply on their argument challenging the 5-year land supply.

Lastly, should it be deemed by the LPA that the Grey Belt test succeeds in this case, the application is for Major Development and as such the Golden Rules (as detailed in paragraphs 67, 156 and 157 of the NPPF) apply, which places a stronger emphasis on the provision of Affordable Housing for the site. The Golden Rules argument has not been addressed by the applicant.

Taking these four points into consideration, and when reviewed against all the policies in the NPPF, the Grey Belt argument fails on NPPF Paragraphs 15, 67, 155(b), 156, and 157.

Objection 2 – Green Belt / Previously Developed Land

As recognised by the applicant, the site lies within the Green Belt. The applicant sets out that given its current use, the site would be classed as previously developed land, and that the exception listed under Paragraph 154(g) of the NPPF would apply. Paragraph 154(g) sets out that the partial or complete redevelopment of previously developed land may be an exception in the Green Belt **subject to** it not causing substantial harm to the openness of the Green Belt.

This part of Ongar is not urban in character, and benefits from clear spatial and visual links to open countryside and farmland. The proposal site consists of mostly single storey buildings, and a considerable amount of open parking provision. Introducing what are in effect four-storey buildings in place of this represents a significant increase in built form, which directly reduces openness, creating a disproportionate addition over the original context of the site. A jump from 1 storey to 4 storeys, or even 3 storeys, would be regarded as a disproportionate increase by any reasonable assessment.

Throughout the applicants Green Belt Assessment, the content repeatedly divides the Green Belt assessment into "within the campus" and "beyond the campus". This distinction has no basis in the NPPF or case law. The Green Belt is a single policy designation, and openness must be assessed holistically, not subdivided into localised zones. This creates an artificial mechanism to minimise harm within the site and disregard cumulative loss of openness.

Furthermore, the applicants Green Belt Assessment focuses heavily on screening by trees, the campus boundary, and the existence of other built development. Openness is both spatial and visual, and the 'absence of visibility' does not negate the loss of openness.

As previously mentioned, the proposed development includes four-storey buildings, yet this height is not assessed anywhere within the applicants Green Belt Assessment. Instead, the assessment that is being used as a basis to ascertain impact is an “*increase in building height from predominantly single storey to two–three storey...*”. This downplays the actual magnitude of development, and the omission of four-storey massing is a critical evidential failure because height increase is central to the spatial and visual openness harms.

In conclusion, the argument for redevelopment of previously developed land under paragraph 154(g) fails on this occasion due to the major increase in bulk and height of built form, creating a greater visual prominence over a wide area. This creates an urbanising effect resulting in a clear encroachment of the Green Belt and loss of rural character.

Summary: This application is **non-compliant** with the following policies:

- Ongar Neighbourhood Plan policy ONG-RR3 part 2, relating to height and increase in built form
- Ongar Neighbourhood Plan policy ONG-ED1 part 1 (a)
- EFDC Local Plan Policy DM4 Green Belt
- EFDC Local Plan policy DM9 High Quality Design part A (i) and (ii), Part D (i), (ii), and (iv)
- EFDC Local Plan policy H1 Housing Mix and Accommodation Types part A (ii)
- NPPF Paragraph 154(g)
- Ongar Design Guide

Objection 3 – Loss of Employment / Commercial

Whilst not formally allocated as an Employment Site within the EFDC Local Plan, the site nonetheless contributes considerably to the employment offer not only locally in Ongar, but in the wider Epping Forest District. The removal of this employment results in the loss of 160 full time jobs, and 2011 square meters of employment space, replacing it with 10 full time and 6 part time jobs, and 275 square meters of employment space (albeit even the applicant is unclear as to what this employment space would be – a retail unit, medical/dental, or even a pub?).

Of particular concern is the loss of a well-used and highly valued crèche that provides essential Early Years provision within the community. The EFDC Infrastructure Delivery Plan (IDP) 2020 update sets out that there is a need for 61 Early Years places simply to meet the needs of new residents. The removal of this essential crèche would intensify the current shortfall in Early Years childcare provision (as identified in the IDP), worsening an already constrained supply of places and limiting access for families who depend on local, affordable childcare. This is something that should be **strongly resisted**.

The NPPF sets out in Paragraph 127 that local planning authorities may allow the release of employment land only where there is *no reasonable prospect* of the site being used for its allocated employment purpose. The site is currently well used, providing much needed employment, and no thought or consideration has been given by the applicant as to what this loss of employment would mean not only to the businesses on site, but to the wider local economy.

It should also be pointed out that there is no supporting evidence contained within the application as to why a retail unit, medical/dental centre, or a pub have been suggested, and these have seemingly simply been ‘thrown in’ as some type of goodwill gesture without any

clear evidence of need. In addition, the possible location for such facilities has not been identified on any of the plans provided.

Summary: This application is **non-compliant** with the following policies:

- Ongar Neighbourhood Plan policy ONG-RR1
- Ongar Neighbourhood Plan policy ONG-CT2
- EFDC Local Plan policy E1 Parts A, B, C and D
- NPPF Paragraphs 127

Objection 4 – Community Facilities

Condition 2 of Planning Application EPF/3211/21 (relating to the neighbouring sports provision) sets out that development should be “*carried out **and retained** strictly in accordance with...SK01 Rev B.*” Plan SK01 Rev B of EPF/3211/21 allocates 40 parking spaces to Fyfield Sports Academy for use in conjunction with the neighbouring provision (see Appendix A). The MUGA, sports pavilion and pitch are extremely well used, not only locally but providing provision for users further afield who do not have walking access to such facilities. By removing these dedicated parking spaces, the proposal would materially restrict access to the sporting facilities for both local residents and the wider community, many of whom depend on on-site parking, inevitably risking the future success of the sports provision. Furthermore, this would shift parking demand onto surrounding residential roads, leading to congestion and reducing ease of access for both sports users and local residents, both compromising highway safety as well as causing discord amongst local residents. The loss of these parking spaces would also render permission for EPF/3211/21 obsolete as the spaces would not have ‘**been retained**’, and the condition therefore not discharged.

Summary: This application is **non-compliant** with the following policies:

- Ongar Neighbourhood Plan policy ONG-CT2 Parts 1 and 2
- Ongar Neighbourhood Plan policy ONG-CT4
- EFDC Local Plan Policy E4 The Visitor Economy Part A(iii), (v) and (vi)
- NPPF Paragraph 98 parts (a) and (c)

Objection 5 – Access / Traffic

OTC questions the applicant’s assertion that the proposals will result in a significant decrease in the number of vehicles that are generated by the site. Table 5.8 of the Transport Assessment sets out that the vehicle trip rates for the entire proposed site are 446 daily (versus 458 as at present). However, 446 daily movements is also the figure in table 5.6 which is only for the proposed housing, not taking into account tables 5.5 and 5.4 which relate to the trip rates for the flats and the proposed commercial use. This needs to be clarified.

In addition, the general road design at the access point to the site was created many years ago and was not designed to accommodate a significant amount of vehicular traffic. As such, OTC has some concern regarding the proposed access.

Summary: This application is **non-compliant** with the following policies:

- EFDC Policy T1 Sustainable Transport Choices Part E (i)

Objection 6 – Heritage

The application detail is inconsistent in terms of use of the land directly north of the listed Converted Stables. The ‘Level’ and ‘Block’ plans provided give the impression that this area would be a ‘green’ area, however the Access and Parking Review plans clearly show this area

to be a turning point for both cars and refuse vehicles, with the turning circle/head being unacceptably close to the listed northern elevation of the listed building. Positioning a refuse / vehicle turning circle immediately adjacent to the wall of a listed building would introduce unnecessary movement, vibration and vehicle activity in close proximity to this protected heritage asset, which has the potential to undermine the building's fabric, setting, and historic character, contrary to the requirement to safeguard the special interest of listed structures.

Summary: This application is **non-compliant** with the following policies:

- Ongar Neighbourhood Plan policy ONG-ED3 Part 3
- EFDC Local Plan Policy DM7 Historic Environment Parts A, B and F

Objection 7 – Affordable Housing / Housing Mix / Design

The applicant states that the proposed scheme cannot provide any affordable housing on the basis of their submitted viability appraisal, which they claim demonstrates that neither on-site provision nor financial contributions are viable. However, in paragraph 7.6 of the Planning Statement, the applicant also states that they fully expect the Local Planning Authority (LPA) to undertake an independent review of the viability assessment, and that the outcome of this review will determine the appropriate approach to affordable housing going forward. Furthermore, at paragraph 7.7, the applicant suggests that there is “*no reason to suppose that a policy-compliant outcome will not be reached,*” and concludes that the scheme should, in the interim, be regarded as compliant with Policy H2. This position is contradictory and misleading.

It is not correct to assert that the scheme is “policy compliant” at this stage, given that the applicant is simultaneously claiming that affordable housing cannot be viably delivered, and accepting that the viability evidence has not yet been independently reviewed or validated by the LPA. It is therefore illogical to argue both that the scheme is incapable of delivering affordable housing *and* that a policy-compliant outcome is likely, particularly when the applicant themselves acknowledges the need for an independent assessment.

OTC therefore formally requests that the LPA undertake a robust and fully independent review of the applicant's Viability Assessment, focused solely on the Site 1 (Phase 1) proposals. This is appropriate and necessary given the applicant has chosen to divide the wider site into phases, yet is proposing a 48% affordable housing provision on Phase 2 (EPF/2429/25), which raises clear questions regarding consistency, cross-subsidy, and the validity of the Phase 1 viability case.

With specific regard to housing mix, the housing types proposed are considerably different to those proposed in the Ongar Neighbourhood Plan, which sets a definitive expectation of 70% 3-bedroom or larger homes 20% 2-bedroom, and 10% 1-bedroom. As currently presented, the suggested housing mix is as follows:

- 28% 3 bedroom homes
- 28% 2 bedroom homes
- 44% 1 bedroom homes

In terms of design, the proposed height, scale, massing and overall design of the proposed housing is very urban in form and character, completely at odds with Ongar's locally defined design guidance. Ongar's Design Guide requires new development to be designed “*with regard to the existing character and context*” of the parish, which it describes as a small historic town set in an open rural landscape, with predominantly low-rise (2–3 storey) buildings, green verges and long views to the countryside. The design proposals create a compact, residential development with multiple blocks which presents an urban design feel that diminishes the soft, open, and green-fronted qualities that define Ongar's settlement character.

Summary: This application is **non-compliant** with the following policies:

- Ongar Neighbourhood Plan policy ONG-RR3 Parts 1, 2 and 3
- Ongar Neighbourhood Plan policy ONG-ED1 Part 1(a)
- EFDC Local Plan Policy H1 Housing Mix and Accommodation Types
- EFDC Local Plan Policy H2 Policy H2 Affordable Homes
- Ongar Design Guide
- Essex Design Guide

Objection 8 – Parking

In addition to the concern raised earlier under objection number 4 regarding parking provision for the adjacent community facilities, OTC argues that as a direct result of the proposed non-compliant housing mix, parking provision is inadequate and fails to meet the Adopted 2024 Essex Parking Guidance. This location is classified in the guidance as being in an area of Low connectivity, however the applicant has made the statement that is an area of Moderate connectivity.

In addition, the suggestion of undercroft parking is incompatible with the rural character of the area, where buildings typically present with active frontages and open ground-level layouts. Undercrofts introduce inactive, recessive voids at street level, undermining the traditional character of rural development, having a lack of natural surveillance which increases vulnerability to crime and antisocial behaviour. Furthermore, the Essex Design Guide makes it very clear that undercroft parking is generally discouraged and is considered “the least satisfactory arrangement” for development, creating dead fronts, poor surveillance, and a disconnection from the street – all of which are well-established crime-risk factors in both planning and “Secured by Design” principles, specifically in a rural setting.

Summary: This application is **non-compliant** with the following policies:

- Ongar Neighbourhood Plan policy ONG-CT3 Part 1 (b)
- EFDC Local Plan Policy H1 Housing Mix and Accommodation Types
- EFDC Local Plan Policy H2 Policy H2 Affordable Homes
- Essex Design Guide
- Essex Police Secured by Design Principles

Objection 9 – Biodiversity Net Gain

The Phase 1 Biodiversity Net Gain Assessment identifies under paragraph 1.8 (figure 1) that the site used for the assessment is a much wider site than the development site itself. Whilst it is accepted that the net gain can be provided either on or off site, the biodiversity baseline must only include the land within the red line boundary of the planning application, i.e., the actual development site itself. As such, the BNG figures have seemingly been calculated using a much wider area than policy requires, and cannot be relied upon.

Summary: This application is **non-compliant** with the following policies:

- EFDC Local Plan Policy DM1 Habitat Protection and Improving Biodiversity
- Schedule 7A of the Town and Country Planning Act 1990,

Objection 10 - Section 106 Agreement

OTC would like to request 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 consisting of circa 590 new homes, and this is expected to increase Ongar's

population by around one third. This would be a site in addition to those already allocated. This proposal is for 47 dwellings, and it is expected that should permission be granted, a contribution per dwelling would be made by the applicant, with the funds agreed to be held and managed by OTC to be used in accordance with the OTC infrastructure priorities. These include:

- Open and Green spaces
- Community facilities
- Sporting facilities
- Highways (added congestion at Four Wantz roundabout and associated arms)

OTC requests that EFDC actively involves and / or consults them on the conversations with developers with regard to s106 contributions. Furthermore, OTC suggest that any contributions are index linked from when the IDP was written. 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 until the terms of the s106 are agreed.

Summary: This application is **non-compliant** with the following policies:

- Ongar Neighbourhood Plan policy ONG-CT4

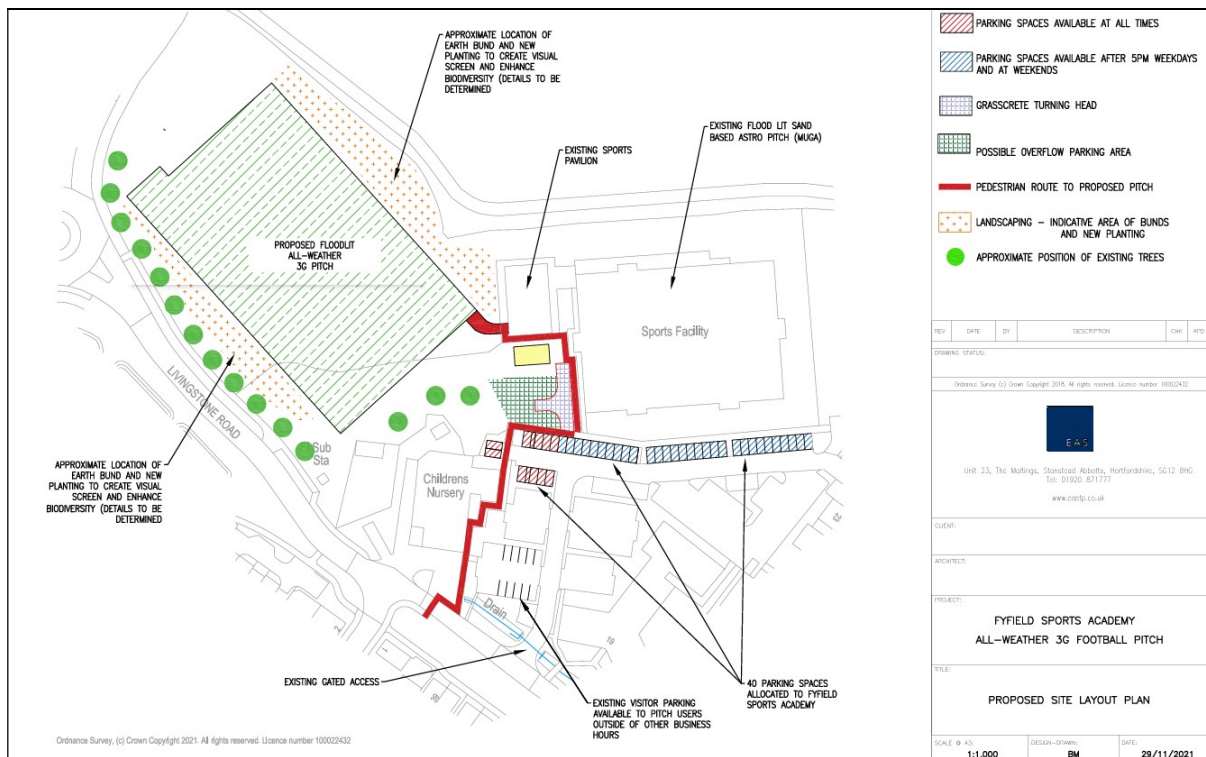
OTC confirms its intention to attend and speak at the relevant planning meeting to confirm its objections.

Yours Sincerely

Lorraine Ellis

Lorraine Ellis, BSc (Hons) CiLCA
Planning Clerk to Ongar Town Council

Appendix A



Plan SK01 Rev B