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

Dear Sukhvinder

Re: EPF/2429/25 - Outline planning application for mixed use redevelopment of Site 2 (Phase 2) comprising the erection of up to 31 no. residential dwellings 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/2429/25, there are clearly correlations between this application and EPF/2427/25, 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 fulfilled as detailed in Objection 2.

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 / Grey Belt

This objection has been split into two parts. The first counters the Grey Belt argument put forward by the applicant. The second addresses the impact on Green Belt.

As recognised by the applicant, the site lies within the Green Belt, and as mentioned in Objection 1 the grey belt test has not been met.

The applicant has provided a Green Belt assessment which includes their rationale for classifying the proposal site as Grey Belt, including referencing the pre-application advice they received from EFDC. However, as confirmed by the applicant, the pre-application advice was based on larger site for a bigger scheme, and as such the advice does not relate specifically to this particular proposed development site and is thus flawed and cannot be applied to this application. In addition, some of the points that the applicant argues meets the Grey Belt test are incorrect.

Firstly, as mentioned under Objection 1, EFDC has evidenced a five-year land supply.

Secondly, paragraph 4.3 of the Green Belt Assessment sets out the LPAs position in regard to the contribution the larger site makes to purpose a) of the Green Belt (to check the unrestricted sprawl of large built-up areas). The applicant states that in EFDCs Pre-Application report dated 27 October 2025, the LPA stated: "*The site is not adjacent to a large built-up area but comprises previously developed land. As such, the proposed development would not result in an incongruous pattern of development.*" Clearly, the site which is the subject of this application **IS NOT** previously developed land, given it is devoid of any permanent structure, is undeveloped, has no fixed surfaces and no hardstanding.

In addition, paragraph 4.7 of the Green Belt Assessment sets out that the site includes “*campus buildings, developed land, carparks and a road network which are contained within those boundaries.*” This is incorrect. The site is an open, green space, completely undeveloped.

The Green Belt Assessment has addressed the matter of “Golden Rules” which would apply in the case of an area of Grey Belt, stating that the ‘test has been met’. Paragraph 67 of the NPPF sets out that development on Grey Belt sites requires at least 50% of the housing to be affordable onsite, however the application only provides 48.3% without any viability testing having been assessed by the LPA. Thus, this part of the Golden Rules test has not been met. In addition, paragraph 156 (c) of the NPPF makes it clear that on sites where the golden rules apply, the application should create the provision of “*new, or improvements to existing, green spaces that are accessible to the public. New residents should be able to access good quality green spaces within a short walk of their home, whether through onsite provision or through access to offsite spaces.*” In the first instance the applicant suggests that as the site already has good access to the surrounding open countryside, on site provision is not necessary. The applicant then goes on to suggest that the scheme will seek to provide new or enhanced improvements to green spaces through access to off- site spaces, however the detail and nature of the contributions that are likely to be required are **not yet clear** and are expected to emerge from discussions with the LPA. This test has also therefore not been met at this time.

As such, the conclusion reached in the Green Belt assessment is both flawed and incorrect, and the site cannot be classified as Grey Belt, meaning the application should be fully assessed on Green Belt policy.

The purpose of the Green Belt is to prevent urban sprawl by keeping land permanently open, the essential characteristics of Green Belts being their openness and their permanence. One of the five core purposes of Green Belt is to assist in safeguarding the countryside from encroachment. Encroachment means the spread of built development into land that is recognisably rural by introducing urbanising influences (buildings, fences, lighting, car parks, activity, etc) into countryside that was previously open and undeveloped. Countryside is defined as open land with an absence of built development, characterised by rural land uses such as agriculture, forestry, natural habitats, and unmanaged scrub. Countryside does not have to be ‘pretty, high quality landscape’, as even scrub land serves as a buffer between developed areas and wider countryside.

The proposed site is an undeveloped area of open green land, consisting of both scrub land, mature trees and hedgerows, and an array of natural habitats located in a rural edge of settlement location which forms part of the transition between a built-up area and open landscape. To transform this area of important open space into an urbanised, built form wholly undermines the purpose of the Green Belt.

In addition, the applicants Landscape and Visual Impact Assessment shows that the significance of the landscape effects overall for Phase 2 are Minor/Moderate adverse, relating to the loss of undeveloped land and its replacement with new built form. As such, even the applicant recognises the negative impact development will have. The proposed development includes three-storey buildings, yet this height is not assessed anywhere within the applicants Green Belt Assessment, as they are simply relying on their Grey Belt argument which we have already concluded is flawed.

In conclusion, to introduce built form to this open area will have an unacceptable 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
- 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 142 and 143
- Ongar Design Guide

Objection 3 – Access / Traffic

The applicant has submitted a Transport Assessment that relates to a larger, wider site, and thus once again is flawed. At present, **NO** vehicles go to the site which is the subject of this application (which is completely undeveloped), therefore the net change suggested in the Transport Assessment is incorrect. The applicant has chosen to submit two separate planning applications – phase 1 and phase 2 – and as such any Transport Assessment submitted should relate entirely to the impact of phase 2. The current assessment should be completely disregarded as presenting inaccurate data.

It should also be noted that 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 4 – Affordable Housing / Housing Mix / Design

The applicant has proposed 48.3% of affordable homes on the site, on the basis they believe this to be Grey Belt land which OTC has proven to be incorrect earlier in this response.

With specific regard to housing mix, the housing types proposed are considerably different to those 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:

- 32% 3 bedroom homes
- 29% 2 bedroom homes
- 39% 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. Notwithstanding the Green Belt impact argument, 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
- Ongar Design Guide
- Essex Design Guide

Objection 5 – Parking

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 6 – Biodiversity Net Gain

The Phase 2 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 7 - Contamination

Within this Phase 2 application, detailed reports have been submitted which confirm a number of Radioactive Substance Authorisations and records of the storage, use, accumulation and disposal of radioactive substances on the adjacent development site (EPF/2427) and another adjacent site. Oddly, these reports are not included on the LPA's planning portal for application EPF/2427/25. According to the contamination report, *“historical records indicate that the former crop research facility held 15 radioactive substances authorisations relating to the disposal of radioactive waste and the keeping and use of radioactive materials. The applicant confirms they have submitted a request to the LPA for information regarding any known contamination on the site and in the surrounding area, and they recommended that, upon receipt of the Council's response, the information be reviewed to determine whether any evidence of past radioactive substance use or disposal presents a potential risk to human health or the environment. This review will inform whether targeted further investigation, including radiological assessment, is warranted to address potential risks associated with radioactive materials on site.”*

Whilst OTC do not have the necessary expertise to assess any potential contaminants, it would seem sensible that neither site (phase 1 or phase 2) should be developed unless it is absolutely clear that there is no evidence or remnants of radioactive substances or waste deposited on the site, and asks that the LPA address this matter with the urgency and seriousness it deserves.

Objection 8 - 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 31 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