

# Ongar

Town Council

Bansons Way, Ongar, Essex, CM5 9AS  
01277 365348



planning@ongartowncouncil.gov.uk  
[www.ongartowncouncil.gov.uk](http://www.ongartowncouncil.gov.uk)

Muhammad Rahman  
Planning Department  
EFDC  
323 High Road  
Epping  
Essex CM16 4BZ

Sent via email: [appcomment@eppingforestdc.gov.uk](mailto:appcomment@eppingforestdc.gov.uk)  
[mrahman@eppingforestdc.gov.uk](mailto:mrahman@eppingforestdc.gov.uk)

01 June 2026

Dear Muhammad

**Re: Re-consultation on revised application EPF/2446/25 – Outline Planning Application with all matters reserved except for access for up to 90 dwellings, parking, landscaping, drainage and associated infrastructure. (ONG.R1 - Allocated Site In Ongar). \*REVISED DESCRIPTION (Increase of 5 Units), PLANS AND SUPPORTING DOCUMENTATION\***

This application was considered at the Ongar Town Council Planning Committee meeting held on 21 May 2026. Please accept this letter as the statutory consultee response from Ongar Town Council (OTC) to the above stated planning application.

The Town Council has viewed the revised application in the context of it being a site allocated in the Local Plan, and accepts that some matters may be resolved at Reserved Matters stage should permission be granted, however as currently presented, OTC **OBJECTS** to this application for the reasons listed below.

There are six areas where OTC have concerns on the revised application, which is less compliant than the previous version:

**i) It is an edge of settlement location and not, as stated, a town centre location**

The applicant refers to the development as adjacent to the town centre. The location is an edge of settlement location, formerly in the green belt, surrounded by farmland to the east, west, and south. It is 300m from the town's boundary and 750m from the town centre and accordingly OTC refutes the applicants claim that the development is adjacent to the town centre and 'suited to smaller units and apartments. This site is defined in the ONP as edge of settlement and contrary to Policy ONG-ED1: Local Character and Design.

**ii) Housing Heights are inappropriate for this edge of settlement location**

The height of the dwellings has increased and there are more 2.5 and 3 storey units on the site. This is inappropriate for this edge of settlement location, contrary to Policy ONG-ED1: Local Character and Design.

### iii) ONG.R2 and drainage

The applicant is proposing to facilitate the 10% BNG in an area south of the development where the previous SUDs system was going to be. This may well be sufficient and should be secured by condition. It is outside the allocated site and in Greenbelt.

Figure 2 Approximate Off-Site Area Location



**Drainage** – Whilst OTC cannot confirm the SUDs calculations, it's noted that the drainage response to the neighbouring development (R2) states the following:

*EPF/1782/25 (adjacent site) – the EFDC Environment Protection and Drainage Team State on their holding objection with regard to the 'Discharge Location' the following: Our records indicate the downstream network of the receiving watercourse is in poor condition and we have concerns over its ability to take the discharge from the site. We strongly recommend the applicant investigates this further in conjunction with the adjacent ONG.R1 site.*

This therefore would also apply to this site and is somewhat concerning. This matter has not been addressed. It is expected that the applicant will state that it can be dealt with by way of reserved matters, but OTC disagree, hence the objection.

### iv) There are no parking plans to allow parking to be assessed and approved

This application clearly states that parking is not a reserved matter. However no detailed plans have been submitted to demonstrate that this application complies with Essex Parking Standards or Ongar Neighbourhood Plan policy ONG-CT3: "Transport and Movement b) 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 or successor standards".

### v) Without defining the housing mix, an increase in housing numbers cannot be approved

Without the Housing mix defined it is not possible to state that 90 houses is compliant with Policy ONG-RR3: "Housing Mix and Standards 1. The mix of accommodation in newbuild residential development must reflect the latest evidence of local need in the civil parish of Ongar to meet the requirements of all parts of the community". The local Strategic Market Housing Assessment (SHMA's) clearly demonstrates the need for around 10% of properties being one bedroom, 20%

being two bedrooms and 70% being three plus bedroom homes. Given the preponderance for 1- and 2-bedroom homes within recently approved applications (currently 40% of properties within approved allocated sites of ONG R3, R4, R5 and R6), there is a clear need to redress the balance in favour of 3+ bedroom homes. This application has not demonstrated that 90 homes can be delivered within either the SHMA's expectations, or that of a redressed housing balance in keeping with the edge of settlement location.

#### **vi) The majority of OTC's previous objections were not addressed**

Please see below for all the specific details, but the applicant's statement that 'The Applicant considers that the revised submissions positively and comprehensively address the substantive consultation issues raised to date' is demonstrably false.

Included below are OTC's previous objections, the majority of which are still valid, and the details have been updated accordingly in *italics*.

#### **Objection 1 – Highways and Access**

OTC has numerous concerns and queries regarding the proposals submitted in terms of highways and access. Given 'Access' is the only matter not reserved as part of this application, these issues must be fully addressed and resolved. OTC requests that it is further consulted once EFDC receives clarification on these matters.

The application suggests (within the Highway Strategy) there will be a relocation of the existing westbound bus layby on the A414 further east, however provides no further detail as to why this is necessary or where it would be relocated. This suggested relocation is not included in the adopted Ongar Movement Strategy. Further details are needed. → *This matter has not been addressed.*

There are inconsistencies in the plans regarding the pedestrian access into the site adjacent to the vehicular access, with the plan on page 36 of the Transport Assessment stating the pedestrian/cycle path will be 2m wide, however all other documents suggest it would be 3m wide. This needs to be clarified (noting that both LTN 1/20 and the Essex Design Guide states it should be a minimum of 3m wide). → *This matter has not been addressed. The Design and Access statement still suggests 3m wide cycle access, however both revised highway plans are still showing 2m access.*

The proposed highway works do not include all works required by the Ongar Movement Strategy, which sets out that the "*developers of ONG.R1 will be responsible for ensuring the improvements to the western arm of the Four Wantz Roundabout and west along the A414 Epping Road (shaded blue) are carried out prior to the first occupation on-site at ONG.R1.*" The works to the western arm of the roundabout have not been included, albeit the applicant does state within their Transport Assessment a commitment to funding/implementing the proposed improvements identified in the Ongar Movement Strategy at the Four Wantz Roundabout including a new signalised pedestrian crossing point to the Epping Road approach. Who will be responsible to completing and funding these works needs to be clarified. → *This matter has not been addressed.*

Whilst PRow Footpath 1 Ongar is detailed on the Access and Movement Parameter Plan, it is not detailed on any of the landscaping or drainage plans, making it impossible to assess the impact on the PRow against the proposed swale which runs south of the development. The plans need updating to allow full consideration of the impact on this PRow to ensure its continued protection. → *This has been amended, and the footpath is 3.5m from the basin (which may be deemed acceptable dependent on the slope and other factors – General rule is allow at least 3–*

*5 metres between a public footpath and the top of an attenuation basin, unless a detailed risk assessment justifies a different approach.*

There are a total of 7 pedestrian access points into the northern part of the development, along with effectively 2 parallel footpaths, one of which runs directly in front of the properties and one directly adjacent to the A414. There are discrepancies in the various plans submitted as to if this will in fact be two separate paths. Further clarification is required as to the rationale for providing 7 pedestrian access points, along with why two parallel paths are necessary. It should be noted that the Secured By Design development document sets out that “Defensible space shall be created to separate a path from a building elevation, to ensure that public footpaths are not immediately next to doors and windows”. → *This matter has not been addressed, still 7 pedestrian access points.*

Whilst accepted it is included in the Ongar Movement Strategy, OTC has safety concerns about the removal of the right turn lane into Walter Mead Close, and requests this matter is further reconsidered by ECC Highways.

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

- Ongar Neighbourhood Plan policy ONG-CT3 parts 1 (a and f)
- EFDC Local Plan policy T1 sustainable Transport Choices parts E (i), (iii)

## **Objection 2 – Housing Types / Housing Mix / Density / Design / Character**

The proposals suggest an indicative housing mix which includes apartment blocks up to 3 storeys located along the northern edge of the development site and through the centre. ONG.R1 is an edge of settlement location, characterised by lower density, larger accommodation with front and rear gardens. The development of considerably larger built form along the northern element of the site would be incongruous, overly dominant, and out of keeping with the area, failing to complement the local context (edge of settlement). It is accepted there are larger apartment blocks located around the Four Wantz roundabout, however this design is not typical of Ongar and should not be replicated. It should also be noted that the height and design of the apartment blocks around the roundabout are restricted to this area, tapering down westward along the A414, partly so as to not affect the setting of the listed Bowes Farm Lodge. The adopted Ongar Design Guide sets out that “*Building height should be appropriate for its context and not deviate from the existing typical building height of the location*”. → *This matter has not been addressed and in fact has got worse - The height of the dwellings has increased and there are more 2.5 and 3 storey units on the site.*

As currently presented, the indicative housing types, design, and density fails to complement the rural character of this part of Ongar, specifically along the northern boundary of the site.

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

- Ongar Neighbourhood Plan policy ONG-RR3 part 2 (b)
- Ongar Neighbourhood Plan policy ONG-ED1 part 1 (a)
- EFDC Local Plan policy DM9 High Quality Design part A (i) and (ii), Part D (i), (ii), (iv) and (vi)
- EFDC Local Plan policy H1 Housing Mix and Accommodation Types part A (ii)
- NPPF Paragraph 139
- Ongar Design Guide

### Objection 3 – Heritage and Conservation

Bowes Farm House is located directly adjacent to the east of the site. The proposed design creates a number of concerning elements which will negatively impact the setting of this listed building. For clarity, the setting of a listed building includes its wider environment, such as local street scene, village character and views both to and from the building, which collectively contributes to how the listed building is 'experienced'. As currently presented, the following elements of the proposal have a detrimental effect on the setting of Bowes Farm House:

- The creation of a footpath which leads directly to the property but abruptly stops at its boundary (see figure A)
- The suggestion that 3 storey buildings could be located extremely close to Bowes Farm House (see the Building Height Parameter Plan, albeit this is contradicted by the indicative street scene plans submitted), which would create a dominant form of development overshadowing Bowes Farm House.

→ *This matter has not been addressed*



Figure A

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

- Ongar Neighbourhood Plan policy ONG-ED3 parts 3 and 5
- EFDC Local Plan policy DM7 Historic Environment parts A, B and E
- NPPF Paragraphs 212 and 219

### Objection 4 – Ecology, Landscaping, Trees and BNG

The application site has changed from that allocated in the EFDC Local Plan, and now includes an area south of the development, itself larger than the original application site. This additional site is proposed to be used for SUDS and to fulfil the BNG requirement. The documents submitted provide no detailed justification for this alteration, nor do they contain any detail regarding management or public access to this new site. The northern section of this additional parcel is proposed for use as attenuation basins, however a considerably large area remains. Further details are required to justify why the surface water drainage cannot be managed in accordance with the West Ongar Concept Framework, as well as how this new area will be managed, maintained, and what public access will be available. → *This matter has been addressed, although I cannot confirm if the calculations are correct.*

In addition, the Bat Activity Survey Report only covers the original site allocation, not the additional proposed site for SUDS and BNG. Whilst it is accepted this additional area would remain open space, its proximity to the trees just north of the Cripsey Brook would require the bat survey to have included this additional site. If changes to open land could influence bat behaviour or be affected by a proposal in any way, a bat survey must consider the ecological function of the land, not just whether physical development is happening there. → *This matter no longer applies.*

There are also inconsistencies and a lack of clarity regarding how the trees and hedging at the northern development boundary facing the A414 will be addressed. The plan on page 39 of the Arboricultural Impact Assessment suggests that the trees and hedging along the majority of the northern boundary will be removed, however the Illustrative Landscape Masterplan suggests these existing trees and hedges will be retained. This needs to be clarified. → *This matter has not been addressed*

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

- Ongar Neighbourhood Plan policy ONG-ED5 part 1
- Ongar Neighbourhood Plan policy ONG-ED6

## Objection 5 - 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 proposal is for 85 dwellings, and it is expected that a contribution per dwelling will 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