

Sent via email to LDFconsult@eppingforestdc.gov.uk

22nd December 2021

Planning Policy
Civic Offices
High Street
Epping
CM16 4BZ

Dear Sir or Madam,

Draft Regulation 16 Repls – Ongar Neighbourhood Plan, Dec 2021

This response is in relation to the Regulation 16 consultation for the Ongar Neighbourhood Plan 2020–2033 Submission Version August 2021 (herein referred to as the ‘Neighbourhood Plan’), on behalf of City & Country and in respect of Land at Bowes Field Ongar (Site Reference ONG–R2).

The Epping Forest Local Plan Submission Version (15 July to 23 September 2021), the ‘EFLPSV’ proposes the site (ONG–R2) to be allocated for residential development, forming part of the West Ongar Concept Framework Masterplan (alongside proposed residential allocation ONG–R1).

Overall, we are supportive of the Neighbourhood Plan. In particular we support the wording of Policy ONG–RR3: Housing Mix and Standards and Policy ONG–ED4: Sustainable Design.

We are however of the view that there are a few elements within draft policies that require re–consideration, as set out in the text below.

Policy ONG–ED1: Local Character and Design

Policy ONG–ED1 of the Neighbourhood Plan responds to local character and design.

Whilst we support all of the key principles set out within the wording of this policy, it should be recognised that it is not always possible to retain all existing trees and hedges within any given site, and as such they should sought to be retained wherever possible, with appropriate mitigation measures sought where required.

At present, the Neighbourhood Plan Policy ONG–ED1 is not aligned to paragraph 131 of the National Planning Policy Framework 2021 (NPPF), which states that:

Planning policies and decisions should ensure that...existing trees are retained wherever possible.

Secondly, it is also recognised that a singular approach to all front boundary treatments for any dwellings is not always appropriate, and the boundary treatment for each new plot should be assessed on a case-by-case basis; as such this should be reflected in the wording of ONG-ED1.

The EFDLPSV Policy DM 3 sets out the below wording, suggesting that proposals should be:

Ensuring the sensitive use of design, layout, materials and external finishes.

This policy can be much more closely adhered to without the Neighbourhood Plan prescribing a singular approach to front boundary treatments only.

The current wording of the policy read as follows, with suggested additions shown in bold:

1. New-build development, including extensions, and alterations to existing dwellings must complement the rural character of the Ongar Parish and the specific character of the immediate context, creating a locally distinctive sense of place. 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, infill of the built up area, edge of settlement of the surrounding rural villages and hamlets of Shelley, Marden Ash and Greensted or in the countryside;

b) Using high quality and durable materials, with a high standard of finish, with locally indigenous materials, in particular, being welcomed;

*c) Retaining existing trees and hedges, **wherever possible** as well as including new planting, including in the street scene, using native local species;*

*d) Using hedges or low-level (1 metre or less) masonry walls constructed of local materials for front boundary treatments; **where appropriate to the street scene and wider context.***

e) Using landscape buffers with open glimpses to the surrounding countryside, to create a soft transition for development on the edge of the rural area;

f) Incorporating views and glimpses to surrounding countryside in layout and form of development.

2. Innovative and creative design solutions designed for the specific site and context will be welcomed, especially where they incorporate superior environmental performance.

It is therefore considered that the above caveats added into Policy ONG:ED1, would ensure that the policy is sufficiently appropriate, flexible and aligned to the NPPF.

Policy ONG-ED6: Landscape and Amenity Buffer Zones and Interpretation of ONG-ED6:

Policy ONG-ED6 of the Neighbourhood Plan reads as below:

1. Development that flanks existing housing must include sufficient landscape or garden separation to protect the amenities of the occupiers of that housing.

2. In developing Local Plan site ONG.R2, a landscape buffer should be provided to the south and east boundaries where the site flanks the rear gardens of existing houses in Great Lawn and The Pavilions (see plan 7.7).

Plan 7.7 shows a landscape buffer area along the western boundary of ONG.R2 (hatched blue). Although this specifies that the plan is 'not drawn to scale', the indicative buffer width does not look proportionate and appears over-sized given the site and the context of its surroundings, which could be misleading. Furthermore, the subsequent Interpretation of ONG-ED6 section of the Neighbourhood Plan, states the following:

Although the policy does not specify the depth of the buffer, it is envisaged that it would be around 15 metres in depth, to provide an effective buffer.

Although it is appreciated that any forthcoming scheme on ONG-R2 needs to consider the relationship between the current properties in Great Lawn and The Pavillions in particular, and that a landscaped buffer could be an appropriate response, the suggestion that the buffer would be around 15 metres deep in order to be effective cannot be supported.

The depth of an appropriate buffer should be assessed and determined on a case-by-case basis, rather than a 'blanket' approach, so that the approach is proportionate within the individual site's context and is an element that should be discussed as part of the concept framework process, as required by the EFLPSV. It is therefore proposed that the following section of the Interpretation of ONG-ED6 wording is deleted as below:

~~*Although the policy does not specify the depth of the buffer, it is envisaged that it would be around 15 metres in depth, to provide an effective buffer.*~~

Additionally, this current approach does not accord with paragraph 125 of the NPPF (as set out below), as it does not encourage an efficient use of land.

Area-based character assessment, design guides and codes and masterplans can help ensure that land is used efficiently while also creating beautiful and sustainable places.

Plans should contain policies to optimise the use of the land in their area and meet as much of the identified housing need as possible.

We therefore consider that the proposed change would ensure that sufficient flexibility is imbedded within the policy, so that a reasonable, appropriate approach can be determined for each individual site. Furthermore, this policy approach should be in accordance with the NPPF and ensure that land is used efficiently, whilst creating attractive and sustainable places.

Please do let us know if you have any queries.

Yours sincerely
City & Country Residential Limited



Harriet Vincett-Wilson
Assistant Land & Planning Manager