

# Epping Forest District Council

## Ongar Neighbourhood Plan

### Regulation 16 Publication response form

This form may be photocopied or downloaded from the website. Further printed copies can also be obtained from the Council. **Please return by 4pm on Thursday 23rd December 2021.**

This form can be returned by e-mail to [LDFconsult@eppingforestdc.gov.uk](mailto:LDFconsult@eppingforestdc.gov.uk) by post to **Planning Policy, Civic Offices, High Street, Epping CM16 4BZ**. Email is the Council's preferred method of receiving comments, as it will help us to handle your representation quickly and efficiently.

Comments are invited, regarding whether the Ongar Neighbourhood Plan and supporting documentation fulfil the "basic conditions", as required by paragraph 8 (1) (a) (2) of Schedule 4B to the Town and Country Planning Act 1990 (inserted by the Localism Act 2011).

If you wish to make comments about the draft Neighbourhood Plan, please specify which of the "basic conditions" you are commenting on. Comments should set out a justification as to why you consider that the basic condition has **NOT** been met, or why you consider that the basic condition has satisfactorily been met. You can also suggest improvements or modification to the draft Neighbourhood Plan.

All comments will be forwarded on to the appointed Examiner for the Plan. You should not assume that there will be an opportunity to add further information, although the Examiner may request additional information from you.

The regulations require that any representations made during the publication period must be submitted to the Examiner together with a summary of the main issues raised. Therefore, comments cannot be treated as confidential, although personal details will not be made publicly available.

Epping Forest District Council will submit all representations made to the Examiner if returned by the deadline. However, please note that late representations will not normally be accepted.

Personal Details		Agents Details (if applicable)	
<i>Organisation Name:</i>	On behalf of the Landowners of ONG.R1  (Eales-White, Johnson, Kerr, Kerr, and McKinney)	<i>Organisation Name:</i>	Sworders
<i>Contact Name:</i>		<i>Contact Name:</i>	Chris Carter
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## **Part 1**

Five “basic conditions” form the statutory requirements for the draft Neighbourhood Plan. These require that the Neighbourhood Plan:

**Please tick the relevant basic condition / supporting documents and submit a separate Part 2 form for each of the basic conditions / supporting documents you are commenting on**

a. having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make neighbourhood plan).	<b>Y</b>
b. the making of the neighbourhood plan contributes to the achievement of sustainable development.	<b>Y</b>
c. the making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).	<b>Y</b>
d. the making of the neighbourhood plan does not breach, and is otherwise compatible with EU obligations.	<b>Y</b>
e prescribed conditions are met in relation to the plan and prescribed matters have been complied with in connection with the proposal for the neighbourhood plan.	<b>Y</b>

Other supporting submission document and supporting documents. Please specific which document you wish to comment on:  We make comments on specific policies within the neighbourhood plan where we consider the wording could be improved in the interest of good planning. Specifically policies ONG-ED1 and ONG-ED6.	
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## **Part 2**

### **Question 1**

<b>Why do you consider that the draft Neighbourhood Plan and/ or supporting documents do/ do not meet the specified “basic condition”?</b> Please provide a brief summary of your comments.
We make comments on specific policies within the neighbourhood plan where we consider the wording could be improved in the interest of good planning. Specifically policies ONG-ED1 and ONG-ED6.

**Detailed explanation and proposed modifications.** Please give further details of your opinion and the reasons for it, as well as any proposed improvements or modifications to the Plan (continue on a separate sheet as necessary).

On behalf of the Landowners of ONG.R1 (Eales-White, Johnson, Kerr, Kerr, and McKinney)  
These comments have been prepared in response to the Regulation 16 consultation for the Ongar Neighbourhood Plan 2020-2033.

Our comments will be restricted to those elements of the Neighbourhood Plan which relate to our client's land, proposed to be allocated in the Epping Forest District Council Local Plan, as site ONG.R1, and as part of a wider concept masterplan along with the land known as ONG.R2.

Policy ONG-ED1 'Local Character and Design' is supported in principle. However, we feel that it is important to acknowledge that there may be circumstances where such a definitive policy wording approach to either the retention of trees and hedgerows, or the provision of a standard approach to front boundary treatments, is problematic. We are of the opinion that a degree of flexibility should be built into the policy wording at this stage.

The wording of the policy currently reads as follows, with suggested additional text 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, **where 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**.*

*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.*

Policy ONG-ED6 'Landscape and Amenity Buffer Zones' primarily relates to the eastern half of the concept masterplan area, that being known as ONG.R2. We have no objection to the principle of a landscaped buffer zone along the shared boundaries with existing residential properties. However, we note that in the supporting text, or rationale, for this policy it is also suggested that an access road from Chipping Ongar High Street should also be within this buffer zone. Again, we have no reason to object to this requirement but would note that when a masterplan is developed for the wider concept masterplan area it should be borne in mind that it may be appropriate to access the whole site from more than one location.

As was the case with the proposed main modifications to the Epping Forest Local Plan, we do not consider there to be any constraint to a second means of access being secured from the A414, and that issues of rat running through the site can be dealt with by detailed design measures which would secure this as a no through road.

An illustrative masterplan was prepared and submitted to the Local Plan examination by the promoters of sites ONG.R1 and ONG.R2 alongside hearing statements which demonstrated how rat-running can easily be avoided by simply ensuring that the two access points do not physically connect for vehicular traffic, with the site being entirely permeable for pedestrian and cycle movements.

Similarly, in regard to safe access to the highway network, and the delivery of a high quality layout which encourages maximum permeability, current guidance, in the form of the Essex Design Guide Design Details Document V3 2018, advises in favour of two access points for new residential development of this scale and against the use of cul-de-sac and loop roads as they create indirect routes for pedestrians and discourage cycle movement in favour of the private car. This is particularly relevant given the natural desire line that will exist between the development site and the school to the north.

It is suggested that the Neighbourhood Plan should acknowledge that a second access from the A414 is appropriate, subject to measures to avoid rat running and may also serve to better preserve the existing protected tree belt which is close to the boundary with the High Street.

## Question 2

The appointed examiner will consider all representations received by the deadline (**4pm on 23<sup>rd</sup> December 2021**). Normally, the examiner will seek to consider all responses through written representations. However, occasionally an examiner may consider it necessary to hold hearing sessions to discuss particular issues.

Please indicate whether you would like to request to be heard before the examiner at the Neighbourhood Plan Examination Hearing: ~~Yes~~ / **No**

If you have indicated that you wish to attend the Examination, please explain why you consider this to be necessary. Please note that this is entirely at the discretion of the examiner:

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## Question 3

Please indicate whether you wish to be notified of either or both of the following:

The publication of the recommendations of the Neighbourhood Plan Examiner

**YES** / ~~NO~~

Final "making" (adoption) of the Neighbourhood Plan by Epping Forest District Council

**YES** / ~~NO~~

<b>Signature:</b>  Chris Carter	<b>Date:</b>  <b>21 December 2021</b>
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Thank you for taking the time to respond.