

## **Consultation Statement for Ongar Neighbourhood Plan 2020-2033**

The focus of the Consultation Statement supporting the Ongar Neighbourhood Plan (ONP) is on the regulation 14 consultation. However, it also includes a summary of previous community engagement and consultation that has been undertaken, the main outcomes of that engagement and how it has informed the content of the Plan. Further details are in the Statement of Engagement and copies of Surveys and their Results which are in the Evidence File.

The following contains details of the Regulation 14 Consultation

- a) Details of people and organisations consulted about the proposed Neighbourhood Plan (NP)
- b) Details of how they were consulted
- c) A summary of the main issues and concerns raised through the consultation process
- d) Descriptions of how these issues and concerns have been considered and addressed in the proposed NP

The preparation of the ONP has involved residents, businesses and other organisations with an interest in the plan area.

This Statement sets out a summary of events and consultations and the ongoing work of the committee of the Steering Group -Ongar Neighbourhood Plan Community Group (ONPCG) since its formation in 2017.

The aim of formal and informal consultations and engagement has been to ensure that Ongar Neighbourhood Plan (ONP) has been community led. Policies are supported by public opinion as well as with hard evidence. External bodies were consulted from an early stage to explore solutions to resolve the majority of the community's concerns. Continued engagement, publicity and communications conveyed intended policies and their rationale. Policies were reviewed in response to comments from statutory consultees, residents and other interested parties throughout and particularly after Regulation 14 Consultation formally between 21<sup>st</sup> January 2021 to 18<sup>th</sup> March 2021.

Changes were made accordingly and in line with the Vision and Aims of the ONP. Projects and Actions that are not planning policies and therefore fall outside the examination process, are provided in an Appendix. Those Projects and Actions, however, complement the policies and help to achieve the aims of ONP.

EFDC has confirmed that neither an SEA nor an HRA is required.

It should also be noted that EFDC's work on its Local Plan 2011-2033 was advanced before a steering group was set up for an Ongar Neighbourhood Plan. It had allocated new residential sites in the civil parish of Ongar, from a selection that were offered, all of which are in the existing Metropolitan Green Belt. ONPCG, and representing Ongar Town Council (OTC) made appropriate Representations on several aspects, and attended several days of the EFDC Local Plan Examiner Public Hearing in 2018. ONP is in conformity with the proposed Local Plan 2011-33 policies, whilst also with the adopted Policies as appropriate.

## **Background**

Ongar Town Council (OTC) as the qualifying body set up a Working Party for a Neighbourhood Plan in spring 2017. The Steering Group -Ongar Neighbourhood Plan Community Group was set up following a successful public meeting on 3<sup>rd</sup> July 2017 attended by over 60 interested stakeholders. EFDC approved the designated neighbourhood plan area to be consistent with the civil parish boundaries of Ongar on 2<sup>nd</sup> June 2017.

ONPCG met regularly from 6<sup>th</sup> September 2017 with open meetings. Topic Subgroups were formed Initial brainstorming and SWOT analysis included a workshop and at various local events such as at the Annual Town Meeting and Annual School Fete carried out.

Research and background analysis of the Neighbourhood got underway and the ONPCG made Representations at the Local Plan Public Enquiry in 2018 on various aspects including proposed allocated residential sites in the civil parish of Ongar.

Consultations about the Neighbourhood Plan include local residents and businesses and various government bodies and organisations, from 2018.

ONPCG promoted the producing of a Neighbourhood Plan reached out widely within the community for involvement through articles in Ongar News and other published papers and magazines, specific advertising of events, banners in the town, stalls at local events. ONPCG commissioned banners to promote the NP at events and set up a website and Facebook page.

Consultations with local residents and businesses took the form of:

- Talks and Questions and Answer sessions to at least 12 specific organisations, Schools, Businesses, or their representatives,
- Interested parties including residents, businesses, landowners and developers and residents' associations were invited to and attended our meetings from time to time,

- Surveys covered a variety of specific topics such as housing, youth, town centre, sports provision and a more comprehensive Residents Survey which was delivered to every household in early 2019.
- The main event was a two day Exhibition in October 2018 in the centre of Chipping Ongar town centre, attended by over 300 people

ONPCG had consultations about the NP – by letter, phone and face to face-with a variety of specialist departments or organisations including EFDC, ECC, Ongar Health Centre, Sport England, Historic England, CPRE, Community Land Trusts, RCCE, Essex Police

#### Process

1. From the beginning of the process a number of glad/sad boards and SWOT were conducted at local events and a workshop with OTC councillors. The issues/aspects raised led to our Vision statement and priorities, and guided our research for policies and evidence. Research helped formulate policies covering the community’s priorities.
2. Continued engagement and consultation, as indicated above, including with experts in the field, enabled constructive criticism and helped with more detail for our policies. Topic questionnaires were also a feature during engagement events. Our most comprehensive community engagement was the two day exhibition in October 2018 (over 300 attendees) and the Residents Survey in February 2019 (around 20% completed returned surveys) Full details and analysis is in the Evidence File
3. Survey results and analysis and continued interactions of engagement shaped the Policies and Justification/Rationale of the Ongar Neighbourhood Plan. These included the top priorities of:
  - Retaining our rural character, prevailing density and height of new homes;
  - Maintaining a balanced housing mix;
  - Ensuring sufficient off street car parking for future homes
4. Where issues or aspects were outside the remit of planning policies, ONPCG started putting together some Projects and Actions (see separate Appendix Projects and Actions) which would complement the neighbourhood plan policies. These included aspects to regenerate the town centre, enhance the natural environment and improve sustainable local transport options.
5. Policies were further reviewed within groups of the community and experts in their field.

## Regulation 14 detail

Regulation 14 Version of ONP had its 6 week consultation from 21st January 2021 until 18<sup>th</sup> March 2021, during lockdown for Covid-19. Methods of promoting the consultation widely yet within the lockdown restrictions were agreed with various bodies including RCCE.

Consultation was widely advertised and promoted by OTC through its website, and social media (Facebook), notice boards. ONPCG also advertised it through Ongar News, on ONPCG website, social media (Facebook) and the social media of local organisations such as Anything Ongar as well as a link to OTC website. OTC made paper copies available by request from OTC office

- Ongar Neighbourhood Plan reg 14 draft and ONP Projects and Actions, Glossary and Ongar design Guide were posted on OTC website, and Ongar Neighbourhood Plan website with the ability to download the documents. Paper versions were available by phoning OTC Office. The Library was closed during this time
- Dates of Reg 14 were posted on OTC website, social media (Facebook) and noticeboards, ONPCG website and Facebook, Anything Ongar Facebook with a link from all these platforms to the Response form. In addition Everythingeppingforest Facebook also posted details and also reminded its followers before the end of the Consultation period
- Links were made available to the OTC Survey Monkey response questionnaire (which included identification of resident/business under GDPR restrictions.) See Appendix for the questions on personal information and the number of responses in the Reg 14 Questionnaire and OTC GDPR policy
- Paper copies of the response questionnaire were available on request from the OTC office-who would post or deliver...the returned questionnaire to be put in OTC office post box- or posted back to OTC
- ONPCG published several articles in Ongar News over several months detailing many of the policies and publicising the Consultation. The monthly free magazine has a circulation of around 2000 (there are just over 2500 homes in Ongar) and is also available on its Facebook page [\(20+\) Ongar News | Facebook](#) . Vision Ongar & Brentwood published an article about the consultation in February [VisionBrentwood-Edition-56-February-21-FINAL-LOW-RES.pdf \(visionmag.co.uk\)](#) . This is a free monthly delivered to Ongar residents and businesses.
- Instead of drop-in sessions in person, 2 dates were agreed for Q and A sessions for the public by zoom Thurs 25<sup>th</sup> Feb at 10am and Thurs 4<sup>th</sup> March at 7pm. The dates were advertised by OTC and ONPCG on their websites and Facebook pages and on other local Facebook pages such as Anything Ongar. Everythingeppingforest also advertised these Q and A zoom sessions
- OTC emailed over 40 statutory consultees (supplied by EFDC) by email as listed below:

Stanford Rivers PC Moreton, Bobbingworth & The Lavers PC Fyfield PC High Ongar PC Harlow DC	LB Redbridge LB Waltham Abbey Brentwood Council BC Kelvedon Hatch PC Stondon Massey PC Essex County Council	Network Rail Highways England Marine Management Organisation BT The West Essex CCG covers Chigwell Parish	Epping Ongar Railway Voluntary Action Epping Forest Epping Forest Transport Action Group
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Uttlesford Broxbourne BC East Herts Chelmsford City Council LB Enfield LB Havering	Hertfordshire County Council The Coal Authority Homes and Communities Agency Natural England Environment Agency Historic England	National Grid UK Power Networks Uniper Energy Cadent Anglian Water Thames Water Affinity Water	
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Ongar Neighbourhood Plan has been amended to account for the valid representations made as a result of Regulation 14. This consists of clarification of some wording within a Policy and removing some parts of a Policy where justification was not deemed to be robust. Further clarification or justification has been added to some Rationales and in a few cases the interpretation has been made clearer. It is our Consultant Chartered Town Planner’s opinion that the changes do not require a further Reg 14 Consultation.

## Regulation 14 Consultation Analysis

### Introduction

ONPCG is grateful for the detailed representations from Statutory Consultees and also from individuals with an interest in the Civil Parish of Ongar. The following is an analysis of all the representations made in response to the Regulation 14 consultation for the Ongar Neighbourhood Plan:

- Residents of the Civil Parish of Ongar
- Epping Forest District Council (18<sup>th</sup> March 2021)
- National Grid (15<sup>th</sup> March 2021)
- Historic England (18<sup>th</sup> March 2021)
- Thames Water (18<sup>th</sup> March 2021)

- Natural England (Annex only)
- Essex County Council (18<sup>th</sup> March 2021)
- Environment Agency (21<sup>st</sup> February 2021)

This document summarises representations made by Statutory Consultees, so should be read in conjunction with the detailed comments in the representation letters, which accompany this statement. Several of the representations include notes by statutory undertakers and others, which are not relevant to policies, but are now added as helpful guidance at the end of the NP.

Our Planning Consultant has advised us relating to both our written responses and also any changes that have been made to the wording of the Policies or additional Justification.

## **Residents of the Civil Parish of Ongar**

Despite being open to local organisations and businesses as well, the only representations came from individual residents, as indicated on the completed forms. Broad support for the plan was received by informal means on social media pages etc. and 30 residents responded. Although this was at first, considered to be a disappointing number, RCCE and other Parish Councils conferred that this level was average for the area. The vast majority of responses were in agreement or strongly agreed with the policies. Several comments considered that some policies did not go far enough. The few that did not agree, by and large thought our policy was in the right direction but not strong enough. Some responders wanted the NP to do something outside its remit and responsibility. Responses came from a wide age range, but none from the under 25s. 25% were 25-44, 32% 45-64 and 43% over 65. Most had lived in Ongar for over 10 years.

## Ongar Neighbourhood Plan Regulation 14 Responses from Ongar residents

Question	agree	dis-agree	Comment	Response from OTC / ONPCG
Do you agree with Policy ONG-RR1: Employment and Rural Diversification?	96% (26)	4% (1)	none	
Do you agree with Policy ONG-RR2: Chipping Ongar High Street?	85% (23)	15% (4)	After the pandemic, it is likely that there will be a lack of businesses willing to lease ground floor retail properties. These should be let go from A1 retail and returned to residential.	Government Policy enables this, including via Permitted Development Directions/Rights (PDR). ONP wants to retain a critical number of business and retail for a successful centre for the community of Ongar to meet and socialise within the Chipping Ongar Conservation Area. NPPF 2021 Paragraph 53 enables the LPA to have Article 4 Directions removed where it undermines the vitality and viability
			I do not agree with resisting converting business premises back to residential. There are quite a few old houses along the high street which have at some point been converted to shops, and many of them are now empty. They could be made into nice homes which would enhance Ongar much more than having empty shops.	see comment above. The Policy would enable businesses other than shops to provide businesses or community and leisure facilities in order to keep the value of a centre where local people meet and socialise. Historically, many shopkeepers lived behind and above the shop. Most houses are outside the primary shopping frontage, and this would continue.

Do you agree with policy ONG-RR3: New Housing Mix and Standards?	73% (19)	27% (7)	Need to identify the needs for people in Ongar. Not sure many residents need small accommodation	EFDC carried out a housing need analysis with other Local Authorities, based on ONS population figures and migration into and out of the area. Its housing needs are district wide. The housing need mix for the district is similar to the existing mix for Ongar with a need for 70% of market housing to be 3+ bedrooms and of affordable to be nearly 67% 3+ bedrooms. See SHMA 2015 report table 4.1 EB405 & EB406
			Priority for affordable housing should be given to people with local links (employment, parents, etc).	Whilst we agree with this, EFDC maintains a district wide list only. We have requested that EFDC consider changing its lists to be able to accommodate local links by town or parish.
			It doesn't go far enough. I have heard over and over again Ongar people talking about the need for our children to be able to afford to buy in Ongar - it is a big issue here. We need to ensure that affordable housing stays affordable. Therefore, we need to design it in such a way that it cannot easily be extended and sold for a profit just a few years down the line.	see comments above. Government and Housing Associations have recently changed the shared ownership and help to buy schemes so that homes remain affordable in perpetuity rather than just benefiting the first owner/part owner.



		<p>I don't believe that Ongar is the type of town first time buyers are attracted too, so disagree with more provision for 1 bed property's for this group. First time buyers usually want a busy town, with good night life, shopping and transport links, e.g. Brentwood, Epping and Loughton. In fact when a first time myself, I bought in Brentwood for those very reasons, moving to Ongar 10 yrs. later when settled in a relationship and ready to start a family.</p>	<p>This is our understanding from surveys and engagement with the public too. That is why this NP wants the majority of new homes to be family homes. High Streets Task Force states that almost 50% of inner-city populations are under 30s. ONS statistics give 21.7% of the population as under 18 but the 18-40 range is lower than other groups, confirming Ongar as a choice for families. ONP approves of one bed flats in the centre, including conversions but wants predominantly family homes elsewhere</p>
		<p>Greater emphasis on family houses and on bungalows for downsizing based on the rural are and lack of transport links</p>	<p>This is our emphasis too, based on engagement with local people and surveys, supported by evidence from ONS and SHMA</p>
		<p>We have enough housing and not enough infrastructure. we need our train back not that polluting affair we have now</p>	<p>Population studies including ONS indicate that there is a net growth in population in EFDC. More housing is dependent on additional infrastructure being provided as per EFDC Infrastructure Delivery Programme. The costs of providing a commuter rail link to Epping were explored by EFDC, but is unlikely to happen. The railway is in private ownership, but for use as a commuter or public line, it would be economically unviable, partly due to the varied commuter destinations of residents and the more flexible working hours. Air quality monitoring is in place close to the historic railway, and it fully complies within pollution parameters.</p>

			The area needs more work with flooding, and schools than housing.	We agree that flooding, including surface water flooding, is a serious issue for Ongar. See policy ONG-ED4 part 4. Work is continuing with ECC and EFDC to improve matters including outside the work of the ONP committee. The ONPCG committee met with ECC relating to school provision. There is sufficient provision or ability to increase provision in Ongar's primary schools and Secondary school to accommodate the expected increase in number of pupils. Pre-school provision is insufficient but is a top priority for the EFDC Infrastructure Delivery Programme and ONP see ONG-CT4 Infrastructure Priorities.
			But parking provision is key when building new homes	We had wanted to have a more ambitious car park provision policy, but were told that an External Examiner would strike it out. We have therefore aligned with government guidelines, also adopted by ECC Parking Standards which now specifies minimum parking spaces e.g. 2 off-street spaces for a 2-bed flat or house
Do you agree with policy ONG-RR4: Broadband?	92% (24)	8% (2)	none	
Do you agree with policy ONG-ED1: Local Character?	100% (26)	0% (0)	none	
Do you agree with policy ONG-ED2: Design and Character in the Chipping	88% (23)	12% (3)	I am concerned that a business which has taken over Poulton's Funeral Directors in the very centre of the Conservation area does not complement the historic character of the town.	We do not comment on individual businesses but have and will alert EFDC Enforcement Officers where policies relating to Conservation Areas and High Street trading breaches planning policies.

Ongar Conservation Area?			I agree with the main idea. However, one concern is that in all the talk of the historic character of the High Street there is no mention of which decade, even century, we want to promote the most. I am concerned about a new and very non-British trend which has crept in recently to change the character of our town centres, namely the prevalence of continental style pavement cafes and other eating establishments. Do we want this in Ongar? In particular, do we want flimsy modern extensions to buildings to be permitted to clutter up our pavements just so that people can be shaded from the wind while eating outside?	The historic character of Chipping Ongar High Street is described by Maria Medlycott in her appraisal of the Conservation Area. The Listed buildings range over several centuries and are protected. Permanent and Temporary 'extensions' requiring listed building planning consent are dealt with by EFDC's specialist officers and actions are taken against breaches, although these take some time.
			Not enough parking for new builds	See comment above
			Even though Ongar is a historic town, and the centre should look that way, a mix of designs and up to date architecture should still be allowed.	Our policy does not prevent up-to date architecture, but requires a high standard of design detail and materials and to complement the original building and its setting.
			This is vital to preserve the character and history that is unique to Chipping Ongar	
Do you agree with policy ONG-ED3: Historic Buildings?	100% (26)	0% (0)	As in my previous comment re Policy ED2, I am concerned that a business which has taken over Poulton's Funeral Directors in the very centre of the Conservation area does not complement the historic character of the town.	see above comment. Please report your concerns to EFDC Conservation Officer and Planning Enforcement. Policies and law are already in place to deal with this.

			Not too much glass, please. Personally I do not like the new Ongar Health Centre building which is both ugly (I think) and impractical (too hot in the waiting area inside in summer).	Ongar Health Centre is not an historic building and would be not complement any building or setting in Chipping Ongar Conservation Area. Any use of glass would still have to comply with all parts of Policy ONG- ED3 and ONG-ED2 if applicable, in addition to the NPPF and EFDC Local Plan
Do you agree with policy ONG-ED4: Sustainable Design?	85% (22)	15% (4)	Mostly agree but cars are a fact of life, especially here with poor transport connections. So cars must also be considered not pushed to a secondary role.	We agree and state that the car should not dominate the street scene. Sufficient off street car park provision must be included in the design of all new developments. See also ONG-CT3 Transport and Movement.
			Design must incorporate the latest energy-saving standards, and allow for the installation of solar panel where appropriate. Some forms of natural surveillance are intrusive on privacy. Increased provision of local policing instead would go some way to reducing crime levels.	The latest Building Regulations will incorporate energy saving standards. Standard Solar panels are not likely to be approved on most Listed Buildings, but Ongar Design Guide encourages solar panels and other methods of energy saving. Secured by Design 2019 (a police initiative) is now included as recommended. There are EFDC policies and national standards to prevent loss of private amenity and overlooking.
			It does not go far enough. You mention the Climate Emergency. We should be addressing how to generate electricity in a sustainable (even if inefficient) manner. One way to tackle this would be for all new houses to be angled appropriately and have solar panels right from the start.	Climate Change is being addressed nationally, at County level and at district level. Their subsequent policies and revised Building Regulations proposals will also apply to any planning application in Ongar. It is not considered that Ongar parish has any different requirements specific to this parish and therefore an additional policy is not required
			We have virtually No public transport you need a car to live in Ongar	This is acknowledged in the argument for provision of car park spaces. See also ONG-CT3 The Appendix Projects and Actions is calling for Improved Public transport in section 2.3

Do you agree with policy ONG-ED5: Environment?	96% (25)	4% (1)	Much more could be done in terms of planting trees in buffer zones alongside developments to screen them from air pollution from traffic; creating landscaped ponds to improve drainage; monitoring biodiversity; reducing Artificial Light At Night, especially adjacent to Green Belt; restricting development on Green Belt land; and creative use of new plantings in green spaces.	NPPF July 2021 now include a requirement to plant trees and biodiversity net gain. Interpretation of Policy ONG-ED6 Landscape Buffers covers tree planting. ONG-ED4 part 2 includes incorporating sustainable urban drainage into the landscape design with the use of ponds. A planning Policy cannot insist on improvement to existing drainage though. Avoiding illumination of wildlife habitats is included in part 1 of ONG ED5. There are strict limits in place nationally relating to building in the Green Belt. The ONP Appendix Projects and Actions part 3 Environment includes improving existing green spaces.
Do you agree with policy ONG-ED6: Landscape Buffers?	100% (26)	0% (0)	Plantings should favour native species and be dense enough to provide visual screening and pollution filtering. They must also have a maintenance provision, or they will turn into unattractive wasteland.	Indigenous local species of trees and hedges is included in the interpretation of ONG ED5. Maintenance provision is being considered for inclusion in the interpretation, including Landscape Buffers Policy ONG-ED6 However, unless such provision of planting is provided as part of a housing development, it is not within a planning policy to ensure a private landowner maintains land to a specified standard.
			I agree in theory. Unfortunately many of the spaces we do have at present are not well maintained. Basically there is a serious problem with litter. Open spaces are not good for wildlife if they are full of plastic and glass. We have what should be nice areas, but even a day or two after clearing litter more is deposited. E.g. of areas: between the Czericay Garden / library area and the castle, behind Sainsbury's, and the Jubilee Nature Reserve. We don't want more places like those.	The maintenance of existing public spaces is a matter for the authority that owns them. Landscape buffers are different spaces from those to which you refer. We are looking to include Maintenance provision for interpretation of this policy...see comment above

Do you agree with policy ONG-CT1: Local Green Space?	100% (26)	0% (0)	none	
Do you agree with policy ONG-CT2: Community, Cultural, Leisure and Sports Facilities?	100% (26)	0% (0)	none	
Do you agree with policy ONG-CT3: Transport and Movement?	96% (25)	4% (1)	Sufficient car parking spaces are essential. Ongar has very limited public transport options and limited employment opportunities. Car ownership is required for residents to commute to their place of employment, for social and recreational purposes, shopping at larger retail towns/outlets. Cycling and walking are not viable forms of transport for these purposes and are primarily for leisure only.	These are also our arguments for greater car park provision throughout Ongar
			When will something be actually done to restrict HGVs on the High Street? This is a major issue, frequently talked about in the town, and has been for a long time, but all we have seen is the blocks put in 20 years or so ago to slow the traffic down, being removed!	This is in ONP Appendix Projects and Actions. Members of ONPCG are still actively pursuing the restrictions of HGVs, with the support of the MP. It is a slow process unfortunately because of the status of the High Street as a Priority Route 1. ONPCG was against the replacement of the blocks with black tarmac for the reason you state.
			Large HGV should be banned from Ongar high Street	see comments above

Do you agree with policy ONG-CT4: Infrastructure Priorities?	84% (21)	16% (4)	A new 'town' park should not be built to the detriment of existing agricultural land. It should not be tied to a property owner's desire to build yet more houses on their land, now or in the future.	That is not the intention of ONPCG
			1. If we want a "town park" I suggest upgrading the play area and field behind the castle, rather than creating an entirely new park. We do not need the sort of park that they have in the middle of cities, because we are already located in beautiful countryside. 2. Extending the footpath network has to be a good thing, but we need to remember that we are in the countryside, and therefore we can expect paths to be muddy at some times of the year. Only paths and pavements within the town should be surfaced.	1. This is already one proposal and could more aptly called a country park. 2. Narrowing of some country footpaths has degraded the soil consistency. A biodegradable surface is envisaged to improve the soil. Pavements or footways within the built environment and linking estates will require different surfaces as will any designated new cycle routes.
			Priority should be A working police station and full time fire station and ambulance station and another Drs	The infrastructure contributions from developers do not cover ongoing operational expenditure of policing and fire station costs
			I agree but would ask that funds are identified for on-going maintenance of these facilities	s106 or other contributions from Developers usually cover maintenance provision for a few years, followed by maintenance being transferred to a private management company for the development, the local council or district council. In the latter cases maintenance is then covered by council tax
			I am concerned, who will pay for the on-going maintenance?	see above
			Not sure what is meant by a 'new town park' within the historic area of the motte and Bailey?	One suggestion is the existing field beside the sports ground and Pleasance car park, but possibly extending around the outside of the Outer Bailey by extending the width of an existing footpath leading to Castle Street

Do you agree with policy ONG-CT5: Footpaths and Cycle Route?	100% (26)	0% (0)	Any low level landscaping needs to be maintained long term. Brambles are currently a problem adjacent to some footpaths. Again, the litter problem needs to be addressed. It makes our open spaces both unattractive to people and dangerous to wildlife.	This is not something that a NP Planning Policy can facilitate. Existing footpaths (PROWS) surfaces should be maintained by ECC. However, there are also individuals and volunteer groups locally and in other parts of the country that help by cutting brambles etc and litter picking. OTC organises litter picks regularly and Ongar in Bloom and EFDC Countrycare also organise groups to look after our local environment in a variety of ways.
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## Epping Forest District Council

**SEA and HRA Screening:**– the LPA has confirmed that a separate screening is not required.

### General Points:

- On a number of occasions, the LPA makes comments that ‘must’ should not be used in policy. Our Planning Consultant has advised us that this is not supported in the outcomes of examinations or in national programme guidance. In some instances ‘should’ may be better, in others ‘must’ is the better word to use. Each case for change of wording has been individually reconsidered accordingly.
- Also, we are advised that where the LPA’s suggestion that phrases like ‘normally’ or where possible’ should be used is in fact poor practice, rendering the policies ineffective.
- A few of the Rationales have been edited for greater clarity and specific relevance or additional evidence in support of the Policy.
- We are advised that these minor changes do not require Regulation 14 to be repeated.
- Overall EFDC has been supportive, and we have acted on advice to strengthen our rationale or amend our content where ONP Policies are not compromised

Policy	Comments from EFDC summary	Response
<b>ONG-RR1</b>	<b>Employment and Rural Diversification</b>	
	Previous concerns have been addressed.	No change.
<b>ONG-RR2</b>	<b>Chipping Ongar High Street</b>	
	I. Changes to Use Class E and permitted development rights changes necessitate updating of policy and rationale.	Redrafted policy now refers to Use Class E (town centre uses). The proposed permitted development rights to allow changes of use to residential has been considered, but will be resisted within the conservation area of the High



	<p>II. Pleasance Car Park has previously been rejected for housing development.</p>	<p>Street, where it would seriously undermine the viability or vitality of the town centre. NPPF Para 53 enables PDR to be withdrawn via Article 4 Directions in such cases, and it is hoped that EFDC would do so to protect the amenity.</p> <p>It is not the intention to enable redevelopment of the Pleasance Car Park for housing. However, more efficient use of land could involve retaining the car parking, but also providing recreational or community facility as well. This could involve ground floor amenity with upper floors car parking, or undercroft parking to the amenity.<sup>1</sup> This would enhance/regenerate the town centre and could generate more income. Alternatively, the displaced car spaces could be moved to another site close by.</p>
<b>ONG-RR3</b>	<b>Housing Mix and Standards</b>	
	<p>I. The mix of Housing must reflect latest evidence of local housing need (but smaller developments may not make this feasible due to responding to specific site constraints). Wording to say for example rather than including suggested would overcome the concern. Market and Affordable Housing needs have different mixes</p> <p>II. The indicative capacity and as set out in the LPSV for allocated sites should be the starting point in assessing the appropriate mix for any new development.</p>	<p>Part 1 has not changed from ‘including’, but the mix is now worded to reflect the local need in Ongar without specifying % mix on specific sites. Evidence from ONS statistics and compared with SHMA 2015 report and Table 4.1, shows them to be very similar. Maintaining this mix would ensure that a balanced mixed society is retained moving forward. Part 2 is deleted</p> <p>Density is moved to Part 2, subsuming the former bullet points dealing with sufficient outside private space and requirement of % of larger homes on most sites (which together determine density). It is evidenced from NPPF,2021, local land statistics on density, National Design Guide 2021, The Secretary of State for Housing (see letter) and EFDC’s CEO (see letter), as indicated in the rationale section 6.4. Although EFDC’s starting indicative density is 30pha, Ongar parish is in the rural part of the district, rather than the suburban south, with an average of 24pha. NPPF 124 expects that achieving appropriate densities and supporting</p>

<sup>1</sup> See Essex Design Guide and parking design

	<p>III. National space standards are welcomed but ‘prescribed’ should read ‘described’ and may require more evidence</p> <p>IV. Dwell standards may need more evidence</p> <p>V. Outdoor space standards may need more evidence</p>	<p>efficient use of land, should maintain an area’s prevailing character and setting. The Policy provides a pragmatic approach to indicate where higher density in more sustainable locations would comply with national policies, thus also enabling more similar densities to existing estates at edge of settlement.</p> <p>Part 3 has been simplified, with expectations written into the Rationale. ‘prescribed’ has been replaced by ‘described’ and replace ‘exceed’ with ‘comply with’.</p> <p>Part 4 has been deleted, but encouraged in the interpretation.</p> <p>Part 5 has been deleted but referred to in the Rationale. Car park provision is in ONG-CT3</p>
<b>ONG-RR4</b>	<b>Broadband</b>	
	The LPA questions the use of the word ‘must’ and also the requirement to require all new development to include broadband provision.	As stated above, EFDC’s comment on the use of the word ‘must’ is not reflected in outcomes from Independent Examinations or national programme guidance. Broadband is a necessity for all residential and business development. No change.
<b>ONG-ED1</b>	<b>Local Character</b>	
	<p>Comments suggest weaker wording on tree protection.</p> <p>Comments that the housing numbers put forward by EFDC Local Plan for each site are ‘appropriate’</p>	<p>NPPF 2021 gives greater emphasis on the important contribution of trees in Ch 12 and para 131 in particular. The LPA’s comments would render the policy ineffective. Wording in the Rationale now makes it clear that where tree loss is unavoidable, such as because of disease, replacement trees must be provided elsewhere in the site. In the Policy ‘native’ now replaces ‘indigenous’ species.</p> <p>Although density, and therefore housing numbers, influences local character, this is covered in Policy RR3 Housing Mix and Standards, and its Rationale section 6.4 see response above</p>
<b>ONG-ED2</b>	<b>Design and Character in the Chipping Ongar Conservation Area</b>	

	<p>'Must' should be avoided and changed to 'should' or 'should normally'</p> <p>References to architectural diversity need more specification with reference to Ongar Design Guide</p> <p>Instead of shutters, grilles should be used as solid shutters have a deadening effect on the street scene.</p>	<p>The LPA's comment on the use of the word 'must' is not reflected in outcomes from Independent Examinations or national programme guidance.</p> <p>Architectural diversity is covered in EFDC Chipping Ongar Conservation Area Appraisal and explained in the Rationale, in addition to Ongar Design Guide. Both are now included in the Interpretation of the Policy.</p> <p>Wording of the Policy has been amended to refer to 'shutters, grilles or other ...' and the requirement for them not to be solid.</p>
<b>ONG-ED3</b>	<b>Historic Buildings</b>	
	<p>Suggest deletion of parts 1, 2 and 3.</p> <p>Suggestion as a minimum that Part 3 removes the need to be a reversible alteration</p> <p>Part 6 does not define constructional detail.</p>	<p>ONP is adding detail to national policy, which will strengthen the requirement for conservation and enhancement of irreplaceable resources. Ongar has suffered demolition or indiscriminate inappropriate alterations to historic buildings and their Settings in the past due to lack of robust Policies. This seeks to prevent further harm to such assets. Thus, No change.</p> <p>This provides flexibility of use for today's changes of use or lifestyle e.g. for smaller rooms. They are, however, likely to change again in the future. In order to be able to enjoy historic buildings today, enabling reversible alterations will ensure that future generations will also still be able to benefit from those buildings as trends inevitably change again for how buildings can be used. In building construction terms, this is a workable requirement. Thus, no change</p> <p>An explanation is now included in the Interpretation</p>
<b>ONG-ED4</b>	<b>Sustainable Design</b>	
	Should all hard surfaces be permeable?	More justification has been added relating to the natural drainage of the area and the Policy amended to exclude housing foundations. Elsewhere it is considered to be beneficial to use permeable materials.

	<p>Implications that Part 2 ‘precludes other opportunities to incorporate high quality public realm....etc.’ and to be contrary to EFDC Policy SP7 MM which applies to all development .</p> <p>Suggestion therefore to combine part 1 and Part2.</p>	<p>Part 2 of the policy relating only to developments which include layout of new roads and footpaths, has been separated for clarity. ONP policies, here and throughout, encourage good and sustainable design. However, it is considered unreasonable to expect the smallest or individual plots or extensions and conversions to comply with all aspects of Part 2, whilst not preventing it. Further clarification has been included in the Interpretation of the Policy. Thus, this policy is not considered to be contrary to EFDC Policy SP7.</p> <p>This has been retained for clarity- see explanation above</p>
<b>ONG-ED5</b>	<b>Environment</b>	
	Previous concerns have been addressed	No change necessary.
<b>ONG-ED6</b>	<b>Landscape Buffers</b>	
	<p>I. In respect of the buffer to ONG-R1/R2 West Ongar Concept, it appears to preclude vehicular access to the EFDC preferred site entrance at the High Street.</p> <p>II. It is not considered compatible with the strategic policies of the Local Plan. It could reduce the amount of development that can be accommodated, compromising the Local Plan, through lower yield or not making the most effective use of the land.</p>	<p>This is not the intention, but that the approach access road via the High Street should form part of the Landscape Buffer with trees shrubs and hedging particularly adjacent to the existing homes in The Pavilions. Wording in the Rationale has been amended for clarity.</p> <p>A Landscape Buffer is needed to protect against the loss of existing Ongar residents’ amenity and privacy in some cases<sup>2</sup>, and is supported by Government in a variety of Policies and Design Guides<sup>3</sup> etc.</p> <p>In response to EFDC concern that it could lead to a lower yield, <b>it is normal to assume that the LPA’s final and full analysis and assessment of a site leading to proposed housing numbers took full account of the need for amenity separation and green space/public realm.</b> We also draw your attention to the Examiner of EFDC Local Plan who at the hearings commented that the numbers allocated for</p>

<sup>2</sup> The Policy is intended to avoid permanent loss or adverse effect on existing residents’ privacy and amenity. (In particular, some of Ongar’s late 20<sup>th</sup> century homes have short back gardens and views over adjoining fields and open green space).

<sup>3</sup> Developers need to appreciate and understand the local characteristics, prevailing character and possible restrictions, before embarking on the more detailed aspects of design, architectural detail etc. for a site. Protecting such amenity is supported by government policy and design guides (NPPF 2021, National Design Guide and Code 2021 and Building Beautiful Report 2020

	<p>III. In Part 1 it is not clear whether the policy is site specific.</p> <p>IV. It is not considered appropriate to be included in the early process of developing the West Ongar Concept framework</p> <p>V. In Part 2 it is not clear what site specific requirements are referring to at 'the south and west boundary' of ONG-R2</p>	<p>sites (except the Masterplans which already had more extensive analysis) may have to be revised if later fuller analysis of each site raised additional constraints or restrictions. Planning applications should comply with updated NPPF 2021 and National Design Guides etc. This equates with an area's prevailing character and setting (including gardens, amenity space, open space and so on) and that effective use of land does not mean high-density, high-rise housing in rural areas<sup>4</sup>. Any reduction in originally suggested numbers on this site would undoubtedly be allowed for within SHMA 2015 calculation. It should also be noted that Ongar has a number of windfall sites recently approved.</p> <p>Part I relates to all development that flanks existing housing, which must include sufficient landscape or garden separation to protect the amenities of the occupiers of that housing. Part 2 is site specific for ONG-R2 only. Policy wording has been clarified accordingly.</p> <p>This comment from EFDC appears to be a discussion on development of Local Plan policy rather than the ONP policy itself. We disagree with the statement though. All government's recent policies relate to the use of National and local policies and Design Guides (incl. Ongar's) and Codes at early stages of a development. Inclusion of landscape buffers needs to be in the early design stages to ensure it is embedded in the overall design. If introduced at a later stage, it would add unnecessary developer costs. Government also supports early engagement of the community with developers and the LPA.</p> <p>Part 2 rationale and interpretation has been reworded for clarity to refer to ONG.R2 as being part of West Ongar Concept Area and the requirement for a Landscape Buffer to the south and EAST (i.e. not 'west' which was incorrect and a</p>
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<sup>4</sup> It was made clear in NPPF 2021 ch11 Effective use of land that that does not mean high-density, high-rise housing (see also letter from Sec of state for Housing). Various national guidelines now in force such as NPPF 2019, National Design Guide 2021, National Model Design Code 2021 and Building For Beauty 2020 make it clear that an area's prevailing character and setting including residential gardens should be retained; existing homes' privacy and amenity space should not be overlooked or compromised; open space should be included within an estate; biodiversity net gain should be achieved and so on. See also RR2, ED1, ED4

	VI. Suggestion to explain a Concept Framework in more detail	typing error) as illustrated on the plan inserted in section 7.7 (which has also been amended for clarity)  This has been done, as a footnote in the rationale and with a reference to EFDC Local Plan Glossary
<b>ONG-CT1</b>	<b>Local Green Space</b>	
	Ongar Local Green Space Assessment (OLGSA) will need to be reviewed against this Policy.  Part 2 is incompatible with national policy, which should treat LGS as Green Belt. It does not preclude any development at all.	Reg 14 version includes maps and a summary of the more detailed OLGSA in the rationale. OLGSA is included in the Evidence Files.  Disagree. Local Green Space is in chapter 8 NPPF paragraphs 101-103 Para 103. "Policies for managing development within a Local Green Space should be consistent with those for Green Belts." i.e. LGS has similar protection to green belts. It does not preclude protective policies. It should also be noted that the purpose of LGS is different from Green Belts, so it is legitimate to have specific policies. No change
<b>ONG-CT2</b>	<b>Community, Cultural, leisure and Sports Facilities</b>	
	Part 2 is a list rather than policy.  Consideration could be given to seeking Assets of Community Value status to increase levels of protection for named facilities	Policy wording has been amended to read "Particular regard should be made to impacts on the following key facilities..."  This will be considered at a future date, independently of the Neighbourhood Development Plan, together with other buildings or facilities already identified. See also no. 5 in ONP Appendix Projects and Actions 'Assets of Community Value'
<b>ONG-CT3</b>	<b>Transport and Movement</b>	
	Part 1 and Part 3 Replace the word 'must' with more flexible wording.  Part 2 (d) Local plan has a proposed MM relating to charging requirements.	See previous comments on the use of 'must'.  MM proposed additional wording of Policy T1 relating to electric vehicle charging points "All such spaces must have direct access to the charging points to be provided." Is slightly different to the wording and interpretation in ONP. It does not conflict so there is no change.

	<p>Suggestion that a reference to EFDC Policy T1 would be helpful</p> <p>Connections could be made to Sustainable Design and Chipping Ongar High Street policies. Merge parts of the policy relating to layout.</p> <p>Information that EFDC has a Sustainable Transport Officer</p>	<p>This is now referred to in the Rationale, which has also been edited for greater clarity and relevance to the Policy ONG-CT3</p> <p>References have been included in the Interpretation of ONG-CT3 to Sustainable Design and Chipping Ongar High Street rationales and policies. Parts of the policy are separate for clarity.</p> <p>This is noted and welcomed, as will be future cooperation and working together.</p>
<b>ONG-CT4</b>	<b>Infrastructure Priorities</b>	
	<p>The LPA highlights the test for S106, suggesting it is not compatible with national policy. LPA also indicate that the Infrastructure Delivery Programme could change deeming the policy ineffective.</p>	<p>Some S106 contributions are made in response to Local Plan requirements for contributions, rather than being specific requirements for the development in question. So the policy is compatible with national policy, (including any envisaged government changes to replace s106) The rationale has been edited for clarity and relevance to the policy.</p>
<b>ONG-CT5</b>	<b>Footpaths and Cycle Routes</b>	
	<p>Part 1 (b) It is unclear why high enclosures should be avoided.</p> <p>Part 2 There is no accompanying map to show the route to safeguard for a PROW or an indication of how it will be funded or implemented</p>	<p>Personal safety concerns with enclosing footpaths between high enclosures is now included in the Rationale together with a reference to use Secured by Design and National Design Guide and National Model Design Code 2021.</p> <p>This relates to the map of land of LGS 3 which was a well walked area but recently blocked off from access to the north and south. An additional map has been included ONG-CT5 and an aerial view from google. The intention is to be safeguarded for future use as a new or re-used permissive route as a footpath or cycle route. Details for implementation cannot go ahead without first bringing in the safeguarding Policy. See also ONP Projects and Actions</p>

## Historic England

### General Points

Historic England made the following comments, which are here with our responses

- It was suggested that: Government’s best practice guidance ‘Manual for Streets (1 and 2), and HE advice ‘Streets for All’ could be referred to.

**Response-**This was already in several parts of ONP but is also now in those parts specifically covering historical environment, both in Rationales and Interpretation
- A list of locally important neighbourhood heritage assets, (e.g. historic buildings, sites, views or places of importance to the local community) and an appropriately worded policy could be added.

**Response-**Section 7.4 Historic Buildings Rationale starts by explaining ‘designated historic assets and also Locally Listed. It was not considered necessary to list everyone. Designated and Locally listed Assets are available via EFDC website.
- The plan could also include consideration of any Grade II listed buildings or locally designated heritage assets which are at risk or in poor condition, and which could then be the focus of specific policies aimed at facilitating their enhancement.

**Response-**It is unclear what such policies would achieve. EFDC has its own Conservation Officer who is proactive in successfully making and following up enforcement orders on privately owned heritage assets that are in poor condition.in our area.
- Suggestions are made for inclusion of various references to Historic England documents and guidance and that historic terminology is included in the glossary.

**Response-**Reference has been added in ED2 to HE guidance relating to Listed Building Consent and documents such as See Historic England Making Changes to Historic Assets Advice Note 2. Links have been added in the Evidence File and Background Documents and the NPPF glossary is being used.
- Overall Historic England is supportive, and we have generally acted on its advice.

ONG-ED2	Design and Character in Chipping Ongar Conservation Area	
	Policy ED2 is amended slightly, because at present although it insists modern shopfronts should be ‘very high quality’ this implies that the reinstatement of more traditional forms of shopfront might not be. We would recommend that a requirement for very high quality design and materials be present throughout	‘The use of for very high-quality design and materials will be expected throughout all work’ has been added into the Interpretation to clarify.



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## Generic advice from Natural England

### General Points

Much of the generic advice has already included been included into ONP where appropriate to our locality.

## Essex County Council

### General Points

- Thematic matters spanning several policies are considered after the specific policy comments
- Overall, the concluding comments are positive ‘there is much in the NP that ECC can support/to which ECC does not raise an objection’ Some comments are seeking to improve the NP in a positive manner. Specifics that ECC is concerned about are identified within the comments below. Similarly, we are appreciative of the detail of the suggestions made.
- Because of the detail in ECC comments on ‘Transport, Sustainability and Climate Change’ a fuller response has been made as below

Policy	ECC comment	Response
	<b>Introduction 1.1 Ongar Neighbourhood Plan</b>	
	Suggest reference to ECC as the Minerals and Waste Authority as well as the adopted Essex Minerals Local Plan (MLP) (2014) and the Essex and Southend-on Sea Waste Local Plan (WLP) (2017) as being part of the formal Development Plan for Epping Forest District.	Reference is added as a footnote and information added at the end under Further Guidance (from different agencies and official bodies
<b>ONG-RR2</b>	<b>Chipping Ongar High Street</b>	
	ECC supports the potential redevelopment of surface car parks for uses supporting the vitality of the High Street centre, but the caveat to this	Wording has been changed to ‘sufficient’ provision. Supporting text in this and throughout the ONP aims to reduce reliance on the car, especially for local journeys. Thus a flexible Policy is needed. This Policy aims to encourage more

	requiring provision of equivalent or better (which might be interpreted to mean 'more') parking within the development or nearby is not supported given the need to reduce traffic impacts.	efficient use of the land for a mixture of amenity and car parking space. This has been made clearer in the Interpretation. However, there is also an aim to improve the local visitor economy, which may result in the need for a greater number of car and coach parking provision in the future (due to poor public transport links). Much of the traffic issues relate to through traffic rather than local residents. See comments below on Transport
<b>ONG-RR3</b>	<b>New Housing Mix and Standards</b>	
	Interpretation states 'Car parking Standards must comply with Essex Design Guide & Essex Parking Standards based on national standards, but more generous provision would be expected due to the lack of employment locally and reliance on cars.' ECC would not support this proposal of increased car parking provision in principle without a clear and compelling justification	Interpretation of ONG-RR3 now refers parking provision to Policy ONG-CT3 and Section 8.4 Transport and Movement, where car parking provision is also justified.
<b>ONG-ED4</b>	<b>Sustainable Design</b>	
	<p>Part 3 Recommended that the Policy is amended to include reference to promoting waste reduction, re-use and recycling, sustainable building design and the use of sustainable materials.</p> <p>Make clear that the laying out and initial maintenance and management of infrastructure including open space, play areas, green infrastructure, allotments, is the responsibility of the developer.</p>	<p>The policy already supports design of high-performance buildings and aspects that reduce environmental impact including recycled materials. We are advised that the policy should not be over-prescriptive.</p> <p>The neighbourhood plan cannot prescribe maintenance requirements in a Policy. However, several policy rationales and interpretations do convey this expectation. There is also an NPPF expectation for the LPA to involve the local community when decisions are made relating to developer contributions to community-based infrastructure. See ONG-CT4 Infrastructure Priorities and Interpretation Environment section 7.6 also indicates the expectation for development on greenfield sites to ensure future stewardship</p>

	Part 4 ECC suggests a separate policy is created for flood management and climate change.	We are acutely aware of flood problems in the Ongar civil parish. But, an additional policy at this stage would require Regulation 14 consultation to be repeated. Furthermore, we do not have the expertise in house to provide the necessary evidence in support such a policy. However, the recently updated NPPF July 2021, and National Design Guide and National Model Design Code 2021 have strengthened this aspect. EFDC has also adopted a Green and Blue Infrastructure and declared a Climate Change emergency. Its Local Plan 2011-2033 has Major Modifications that will strengthen flood management. It is expected that these will be enough to protect vulnerable land and prevent new development from causing further surface water flooding issues. Rationale in this Policy and Environment Policy ED5 have included more evidence relating to local flooding. Comments have been noted, flooding policies at Local Plan level and national level will be monitored for effectiveness in forthcoming planning applications. It will be reviewed when the Plan is reviewed in due course.
<b>ONG-ED5</b>	<b>Policy: Environment</b>	
	Part 2 (a) All developments should demonstrate the environmental net gains, and where there is a net loss from the development to secure provision through offsetting A new set of standards has been developed by Building with Nature.	A clear requirement has been added to 'create net gains in biodiversity' for all development to achieve biodiversity net gain. It is also included in July 2021 NPPF and other government recent documents. Reference has been made to the 'Building with Nature' standard in the rationale of the policy, as being useful in complying with the policy's requirements.
<b>ONG-CT1</b>	<b>Local Green Space</b>	
	Part 1 The policy wording could be amended to include the following: "The following spaces are designated as Local Green Space and will be protected, managed, maintained and improved to promote regular use and community enjoyment."	The designation of Local Green Space does give protection for community enjoyment. However, we are advised that the other wording is beyond the scope of our Neighbourhood Plan Policy. The suggested wording is not added.
<b>ONG-CT3</b>	<b>Transport and Movement</b>	
	Policy omits any mention of public transport.	Provision of public transport falls outside of the developer's control. However, EFDC's T1 Policy Sustainable Transport Choices is fairly comprehensive and also

	ECC claims that ONP does “not seek to address private vehicle use and is inherently unsustainable” See later ECC comment in ‘ <b>Transport, sustainability and Climate Change</b> ’ answered below	requires developers to provide Travel Plans. EFDC has also appointed a Sustainable transport Officer, which includes supporting public transport.  Disagree. ONG-CT3 addresses private vehicle ‘use’ with policies to provide cycle storage (part 1), provide links to surrounding PROWS, pedestrian routes within a site, safe crossings to link to bus stops schools etc. (Part 2) in particular. Rationale in 8.4 has been edited to make this clearer. It should be noted however, that ONP can only provide Policies to support reducing car local journeys and that private vehicles will still be required to commute to work, due to the lack of employment locally and poor public transport links to places of work. It complies with NPPF 2021 Ch. 9 Promoting Sustainable Transport
<b>ONG-CT5</b>	<b>Footpaths and Cycle Route</b>	
	Plan of proposed new cycleway /footpath is not included in the consultation documents.	This is described in the text and relates to the map of land of proposed Local Green Space LGS 3 which was a well walked area but recently blocked off from access to the north and south. The map was inadvertently omitted but now added as map ONG-CT5 and an aerial view from google

<b>ECC- Thematic matters spanning several policies of the NP</b>		
	<b>Green Infrastructure</b>	
	Recommend a further green infrastructure/natural environment policy is included in the NP.	An additional policy at this late stage would require Regulation 14 consultation to be repeated. It is only relatively recently that EFDC and ECC’s Green Infrastructure Strategies have been approved after much consultation. NPPF 2021 and various recent Design Guides and Codes also include additional green policies. Defining additional policies may not be needed. However, all the above are referred to and many green issues are dealt with at various parts of ONP with accompanying Policies e.g. Natural Environment, Local Green Space, Character and design and Sustainable Design. In addition, we have noted the suggestion to be considered again when the ONP is monitored and reviewed in due course.

	<p>An opportunity to identify GI deficiencies, which can be addressed through planning, such as improved connectivity to existing and new green spaces and types of green facilities in need (e.g. play parks, Sustainable Urban Drainage), as well as the provision of new open space as part of the new development. It also gives scope for any developments to contribute to improvements to a green space based on community need.</p> <p>The NP also makes no reference to the Essex Green Infrastructure Strategy (EGIS).</p>	<p>GI deficiencies were identified at the beginning of our planning and many of the examples quoted are addressed, where they are not covered by EFDC, and we have evidence to support them e.g. Local Green Space. See ONG-CT4 Infrastructure Priorities which includes a town park. Other aspects including green corridors are included as ONP Projects and Actions in our appendix.</p> <p>This comment is incorrect. ONP does refer to Green Infrastructure matters and Strategies of both EFDC and ECC in several places incl. 7.6 Natural Environment and 8.2 Local Green Space and in the Appendix Projects and Actions. They were invaluable in helping to inform our policies (although at that stage ECC and EFDC's were in draft form) and are listed in our Evidence File</p>
	<b>Renewable Energy</b>	
	<p>Not addressed by ONP. A separate renewable policy would be a positive way of communicating the communities' position on renewable energy and the type of technologies that could be considered.</p>	<p>Our initial SWOT analysis with various groups in Ongar did not raise this issue, and without in- house expertise to find sufficient evidence to support a specific policy for Ongar in this fast moving field, we are relying on policies in the NPPF, EFDC Local Plan (Policy DM20) and various national guides for the ONP 2020-2033. ECC suggestions will be considered within the NP review in due course.</p>
	<b>Electric Vehicles</b>	
	<p>Consider the provision for and promotion of electric vehicles through the NP.</p>	<p>Transport and Movement Policy CT3 already includes requirements for electric vehicle charging points for residential developments and also for businesses that have at least 10 car park spaces. See also EFDC comments and the Local Plan MMs It is unclear how a Planning Policy would 'promote' electric vehicles.</p>
	<b>Transport, Sustainability and Climate Change</b>	

**Summary:** ECC is particularly critical in areas of Transport, Sustainability and Climate Change, much of which is outside the scope and remit of neighbourhood plans and ONP in particular. It also claims that ONP is perpetuating and exacerbating the use of private vehicles

**General response:** As explained in ONP:

- few working local residents have an alternative to private vehicles due to the rural location, lack of local employment and poor public transport accessibility.
- Existing traffic congestion (and pollution) issues in Ongar are due to through-traffic, not traffic within the parish (evidenced in surveys including Jacobs Ringway Jan 2017<sup>5</sup>).

Arguably the new Housing Sites allocated for Ongar in EFDC Local Plan are not in suitable locations for sustainable development as per NPPF 2021 criteria.

In this respect, ONP Steering Group considered ways to

- reduce dependence on private vehicles
- reduce the congestion (and pollution) effects from through traffic
- avoid future issues from lack of on-street parking provision for new housing (identified as an existing problem in parts of Ongar).

But, ONP cannot provide local employment or public transport. It has a policy to try to prevent further loss of employment (ONG-RR2 part 2), which relates to ONP Aim 5 to promote a better sustainable live-work patterns. Projects relating to sustainable transport options are in ONP Appendix Projects and Actions part 2 Transport. Already surveys indicate that the majority of local journeys are on foot. Policies including ONG-CT3 part2 include provision of pedestrian routes and links from new estates.

Sustainable Design includes the social objective Para 8 (a) NPPF 2021 for 'well designed, beautiful and safe places' This includes providing sufficient car park provision for the needs of the community (see also National Design Guide and Code) The parking standards are not to encourage car use but to prevent blight of our street scene when insufficient off street car parking is provided. For instance, recently built Walter Mead Close as an example of several in Ongar where the street scene is dominated by cars, also preventing access for essential services. This is a result of insufficient parking provision at the planning stage.

Over the lifetime of ONP, the sale of petrol and diesel fuelled vehicles will be restricted or prohibited, thus reducing air pollution. However, it is expected that electric cars and hydrogen based, or other green energy vehicles will replace them in Ongar, because of this rural relatively isolated location, lack of local employment and poor public transport to the varied places of work. Retention of cars by society, especially in rural areas is also acknowledged in various more recent government documents. Thus the need for car park provision will remain in Ongar at least for foreseeable future and needs to be addressed.

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<sup>5</sup> More evidence can be supplied including from census and traffic flow data and local surveys. Despite there only being around 2,500 households in the whole of the parish, there were around 17,500 daily journeys even in Jan 2017, with over 10% lorries and around 200 of 44 tonners. Solutions will need to be approved and implemented by ECC

	<p>ECC recommends reviewing and reconsidering the NP strategically and in detail relating to Transport, Sustainability and Climate Change, to take the opportunity to look beyond the parish towards concerted approaches and actions with other partners, EFDC and ECC.</p>	<p>We have reviewed our strategy and detail in the light of a changing emphasis from Government, NPPF July 2021, the 2019 government and its revised NPPF, National Design Guide and National Model Design Code 2021 and are confident that our aims and policies are in alignment with these as well as the Local Plan. Section 8.4 Transport and Movement rationale has been edited accordingly for clarity. Policy ONG-CT3 remains the same. See general response as above. Climate change aspects have been answered in response to comments re ONG-ED4 above. Sustainability See general response as above and various specific responses throughout and below</p> <p>As already stated, some of ECC suggestions are included in our Policies, whilst others lie outside the remit of a NP generally and our ONP in particular. Those that lie outside ONP policies are largely being addressed (where local opinion supports this) in ONP Appendix Projects and Actions. Already work is underway with a range of partners, local organisations, other local councils, EFDC and ECC relating to:- Sustainable transport, regenerating the High Street, regenerating Shelley housing estate, Economic Growth aspects, well-being (through the Live Well initiative), reducing through traffic from Chipping Ongar High Street, Climate change initiatives such as tree planting and so on.</p> <p>A neighbourhood plan has limited scope to influence sustainable development beyond those policies and Projects that we have included</p> <p>However, with an expected increase by a third (800 new homes since 2011 &amp; allocated by EFDC-with around 70% 3+ bedrooms) we are realistic about the need to provide sufficient off street car parking for households at home and to some extent at key destinations within the parish. Thus our policies will also look after the well- being, by ensuring that new homes are not marred with indiscriminate on street parking. It is well known that insufficient car park spaces also leads to friction amongst neighbouring households.</p>
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	<p>It also questions that the NP serves to perpetuate or exacerbate the issue of Ongar residents being car dependent.</p>	<p>We would welcome more constructive approach from ECC to resolving Ongar's traffic congestion problems, which to date has not been forthcoming. This is top of the residents' concerns.</p> <p>As indicated above in the general response, most of Ongar's traffic congestion and vehicle related pollution problems come through traffic using Chipping Ongar High Street as a short cut. Despite only around 2,500 Ongar households, around 17,500 daily journeys were made daily 4 years ago in Jan 2017. Over were 10% lorries and around 200 were 44 tonners.</p> <p>Solutions will need to be approved and implemented by ECC.</p> <p>OTC, ONPCG, local residents and our MP have all campaigned over many years to resolve the High Street traffic problems. A bypass has been refused many times; the traffic calming coloured pavements removed; an HGV weight restriction stalled (despite being recommended by Cllr Bentley several years ago); a recommended lorry route not put in place; no other traffic calming methods put in place; no widening of the pavements has been put in place nor 20mph restriction (even during covid). The A414 approach to the 4 Wantz roundabout in the parish needs ECC to review on pedestrian safety and pollution grounds.</p> <p>As stated above, ONP is NOT 'perpetuating or exacerbating the issue'. Car dependency in Ongar is dictated by the need from fairly isolated location, lack of local employment and poor public transport to places of work. ONP is not allocating more housing sites and does not have the power to improve local employment or public transport.</p> <p>Within the remit of a NP, ONP provides realistic policies to enable more local journeys can be on foot for new residents and to provide sufficient parking to enable good urban design. As stated above, ONP Appendix outlines various possible Projects and Actions alongside these. We would welcome ECC to work constructively with us to resolve these immediate issues identified above, and to plan and implement some of the proposals within the Projects and Actions Appendix and to provide a more joined up network of footways and cycle tracks linking the parish with the wider area.</p>
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		decision to increase the housing by a third (around 800 homes) in this rural area, other than how it has done.
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## Environment Agency

### Main Points

- Various references are made to the SEA for the Ongar NP. EFDC has responded confirming that an SEA is not required
- Flood risk, River Water Quality, Aquifers, Waste and Waste water were commented on  
**Response**-References are made in a new section “Further Guidance from....”at the end of the ONP document
- General Opportunities were suggested including : new green spaces or improvements to public space through new development; recognising the value of certain environmental features to help bring forward environmental projects without development to help secure wider funding; helping to manage the risk of flooding by providing landscaping to manage and store water, and by promoting the use of sustainable drainage systems (SuDS); encourage energy and water efficiency measures for new builds.  
**Response**-The various suggestions are a mix of projects and development requirements. Some are included in the Policies or ONP Projects and Actions. Others are noted for future consideration included in a new section “Further Guidance from....”at the end of the ONP document.

## The National Grid

- Useful comments from National Grid are now included in a new section “Further Guidance from....”at the end of the ONP document

## Thames Water

- Useful comments from Thames Water are now included in a new section “Further Guidance from....”at the end of the ONP document

# Appendix

## ONP Reg 14 Questions relating to personal information

The start page stated –

“First, we would like to know a bit about you to see if we have a good cross-section of the population with everyone having their say. We will not use the identifying information for any other purpose, nor will we share with other people. For more information see our privacy policy.

Although you have the power to use and forward the contact details to Epping Forest District Council, the safest option is to send them through [NP@ongartowncouncil.gov.uk](mailto:NP@ongartowncouncil.gov.uk) and forward the results to District.”

### Questions

- Q1 Where in Ongar do you live? (please tick)
- Q2 What is your postcode? (optional)
- Q3 what is your email address? (optional)
- Q4 Are you responding as an individual, or an organisation?
- Q5 What is your age?
- Q6 How long have you lived in Ongar
- Q7 What is your work-related status?
- Q8 If you are in employment, do you work in Ongar?
- Q9 Do we have your consent to store this information

### Numbers who answered or skipped the question

Answered: 30	Skipped: 0
Answered: 24	Skipped: 6
Answered: 18	Skipped: 12
Answered: 30	Skipped: 0
Answered: 28	Skipped: 2
Answered: 29	Skipped: 1
Answered: 29	Skipped: 1
Answered: 19	Skipped: 11
Answered: 28	Skipped: 2

### Ongar Town Council GDPR policy



GDPR privacy notice  
published.pdf

## **Endnote**

Copies of the full Representations are provided as separate pdfs.

For more detail see Engagement Statement in evidence file