

**Ongar Neighbourhood Plan
Community Group**

*Ongar Neighbourhood Plan Community Group (ONPCG) was set up in May 2017 to produce Ongar Neighbourhood Plan on behalf of Ongar Town Council. Ongar Neighbourhood Plan expects to be going to Consultation (Reg. 14) late Spring 2019. Ongar Neighbourhood Plan aims to be ‘made’ around the time EFDC Local Plan is adopted in order to exert its legal place in Planning Applications for the imminent proposed new development in Ongar (which will increase the housing stock by approx. 1/3rd from 2011-2033). ONPCG Reg 19 Representation and Appendices is ref: **19OTH0042**.*

Please find our Statement as follows:

	<u>Matter 1 Legal Compliance</u>
	Issue 1 Question 2 and Question 3
	Issue 1 Question 2
Relates to lack of regard given to Ongar NP which is in preparation	<p>Contrary to legal requirement and EFDC Local Plan para 6.48 intention to collaborate with Neighbourhood Plan Groups, all advice and other support was stopped between EFDC and Neighbourhood Plan Groups from October 2017- August 2018 during the crucial time for Ongar’s Neighbourhood Plan and is again severely restricted from January 2019 pending The Examination of the Local Plan</p> <ul style="list-style-type: none"> • The EFDC letter¹ from Cllr Philip stated that support was “restricted to the services offered by the Rural Community Council for Essex [RCCE]” from that date in October 2017 until the Local Plan was submitted in March 2018. In reality EFDC did not answer questions or agree to meet until August 2018 over 10 months. This included stopping advice about EFDC draft policies etc. RCCE had limited time allocated and were unable to supply specific data and information ONPCG needed relating to Ongar which EFDC holds. <p>In view of the above, ONPCG has had no little opportunity to influence the proposed sites selected by EFDC.</p> <p>The consequences of lack of regard for Ongar Neighbourhood Plan which is in preparation stage jeopardises our timing in having Ongar’s Neighbourhood Plan made around the time that EFDC Local Plan is adopted.</p>
	Issue 1 Question 3
Which Policies are Strategic Policies?	<p>ONPCG still does not know whether Strategic Policies are limited to SP Policies in Ch. 2 or whether other elements in other Policies such as Policy P4 are also Strategic Policies, despite several written and verbal requests to the EFDC Local Plan team ldfconsult. This is crucial in ensuring that the emerging Ongar Neighbourhood Plan is developed in accordance with the Local Plan now under examination. ONPCG therefore requires clarification on this now and requests statements in the Local Plan for future local councils.</p> <ul style="list-style-type: none"> • What is the status of Policy P4 Ongar? • Policy P4 does not appear in the SP Policies Chapter. That presumes it is NOT a Strategic Policy. • Identifying the total allocated Housing Numbers to Specific Sites in P4 it

¹ 13.10.2017 letter from Cllr Philip to all Town and Parish Councils

**Ongar Neighbourhood Plan
Community Group**

	<p>assumes it is a Strategic Policy.</p> <p>Either way allocating sites in P4 pre-empts Ongar’s Neighbourhood Plan making their own site selections for residential, employment and community facilities and amenities in Ongar and use Place-Shaping principles to choose the best sites for Ongar according to Sustainable Development and Policy SP1 A, which intends to “improve the economic social and environmental condition of the district”.</p> <p>Additional Modifications to the Local Plan or discussions with ONPCG have not been permitted</p> <ul style="list-style-type: none"> • Queries such as clarifying the situation relating to Ongar’s future development have not been answered e.g. clarification on densities for edge of settlement sites in our rural location Policy SP3 iv should have been applied to P4 Ongar sites and not SP3 iii, due to the characterisation of the surrounding countryside and distinctive historic character of Chipping Ongar, but have not. <p>Major Amendments would require the Inspector to instruct EFDC to make changes and these will be addressed in Matter 15 Issue 2 P4 Ongar. ONPCG were refused the opportunity to raise the anomalies with the Ldf team or a planner assigned to help Neighbourhood Plans, which we considered to be errors that needed rectifying. Examples are:</p> <ul style="list-style-type: none"> • Early in the process of producing EFDC Local Plan, information about Ongar was incorrect including in the Green Belt Review EB 704A-B and EB 705 and shape of the medieval town plan still evident today. It was either not picked up on by EFDC or not corrected. • The lack of early general availability of such documents as Site Selection Reports and Greens Belt Review reports, prevented those with local knowledge bringing these mistakes of external Consultants to the planners’ and Committee’s attention. This has crucially resulted in incorrect Place Shaping of development for Ongar in Policy P4. E.g. The shape of medieval town of Chipping Ongar is not ‘linear’ in nature, but roughly circular and within a typical medieval town enclosure with further knock- on issues. • Consequences will be that final choice of sites <ul style="list-style-type: none"> ○ will not be able to provide the essential infrastructure as identified in EB1101B ○ will not be in sustainable locations ○ not locally supported ○ will not “improve the economic social and environmental condition of the district” according to Policy SP1A <p>This is partly through not applying Place-Shaping principles to Ongar.</p> <p>Site Selection process for Ongar is flawed.</p> <p>We would argue that P4 is not a Strategic Policy although amendments could fall into the Major Amendments that would rely on the Inspector Instructing the changes to site selection for Ongar by properly assigning masterplanning /urban</p>
--	---

**Ongar Neighbourhood Plan
Community Group**

	design to accommodate the most desirable locations for the community hub amenities.
	Issue 2 Question 2 a,b,f and Question 3g.h.i
	Issue 2 Question 2a
Affected Residents not informed of proposals	The allocated Housing sites for Ongar directly affect many existing local residents. Our evidence is that affected residents were not personally informed of the proposed site allocations. ² We have statements from a number of residents whose gardens will abut those sites or are directly opposite a proposed new site: ONG R1 ONG R2, ONG R3, ONG R4, ONG R5, ONG R6, ONG R7, ONG R8. All these residents are close enough to the proposed developments to have received a Planning Application Notice. Not one resident received such a letter and has only found out about these sites by chance. There is no local paper for Ongar itself. There was a display in Ongar on the Draft Local Plan, before sites were decided on; Ongar Town Council put notices on their Noticeboard and website. Two households have only recently bought their houses and neither Solicitor found proposals in EFDC Local Searches.
	Issue 2 Question 2b
Secrecy about Reg 19 version and inadequate publicity	ONPCG was not informed about Regulation 19 version of EFDC Local Plan until EFDC Full Council approved it on 9 th December 2017. Even District Councillors were not informed of any detail until a workshop on 28 th November and were told not to disclose any details before Full Council ³ . We were not aware of any local publicity, meetings etc. but were told that Representations at Reg. 19 were very restricted unless there is evidence of the Local Plan being unsound. We had to find the document on EFDC website and crucially the posted email address for its return was incorrect.
	Issue 2 Question 2f
Absence of Site Selection Appendix B & other documents	Absence of Site Selection Appendix B. As non-professionals, it was not clear how Site Selection was arrived at from the many Site Selection Reports on the website until latterly reading the Sustainability Report by AECOM Dec 2017. Despite inaccuracies about individual sites in the selection process being brought to the Council's notice at a September 2017 Council Meeting, these have not been reassessed. 4 Global draft Report on various aspects of sports provision and Open Spaces was on the website during the Consultation period and then was replaced with a final version. This adds suspicion as to how and why there were any changes between versions of 4 Global's Reports, including the assumption of the closure of Ongar Leisure Centre which was suggested in various versions of reports. Thus not having all the information available at the Reg 19 has made the process even more confusing.
	Issue 2 Question 3g
Responses on the Plan have not informed the submission version	As far as Ongar's Representations to both Consultations of Draft Local Plan and at other stages EFDC have not listened. <ul style="list-style-type: none"> No changes were made to Policy D4 Community, Leisure and Cultural Facilities. It is of great concern that the wording of D4 would enable Ongar Leisure Centre to close and relocate to North Weald without local

² Letters from residents at Great Lawn, Springfield Close, Fairfield Road, and Marden Ash are available.

³ Cllr Brian Surtees email of 29.11 2017

**Ongar Neighbourhood Plan
Community Group**

	<p>opinion and further consultation. [This is planned and stated in 4 Global’s draft Reports and contract of PfP that EFDC (already) intend to do in five years’ time.]</p> <ul style="list-style-type: none"> • There has been no opportunity whatever for meaningful engagements to increase job opportunities in Ongar, despite some sites being redeveloped for housing since 2011 which has reduced Ongar’s employment offering and number of sites.
	Issue 2 Question 3h
No prior indication of Site changes	<p>Changes at Reg 19 were kept quiet by EFDC until December 2017. In Ongar P4 there has been a change of site allocation with no opportunity whatever for meaningful engagements with Ongar Town Council or ONPCG (or we understand interested Landowners in Ongar) for a choice of new included sites or any indications that the ‘ranking’ of choice for the new sites when announced, had been justified. Neither was there any indication that the uproar caused by selling the Leisure Centre land had been listened to and the site withdrawn by EFDC. It had been widely stated by EFDC that site allocations were not being changed. ONPCG had unsuccessfully requested meetings with EFDC to raise Ongar’s problems about incorrect analysis of Green Belt parcels leading to sites being unfairly rejected early in the selection process.</p>
	Issue 2 Question 3i
ONPCG and Ongar TC were not informed of changes	<p>EFDC did not inform interested parties about any significant changes to EFDC Local Plan, including Ongar Town Council, Ongar Neighbourhood Plan Community Group, Petition leaders (on Save Ongar Leisure Centre). Cllr Brian Surtees’ email of 29.11.2017 confirms that all District Councillors were told not to disclose any possible changes before they were discussed at full Council in early December 2017</p>
	Issue 3 Question 1 and Question 2
	Issue 3 Question 1
Duty to cooperate omissions	<p>Although there is much cooperation with planning authorities to the West and North of EFDC, there is little mention of neighbouring authorities to the east- Chelmsford and Brentwood. In particular:</p> <ul style="list-style-type: none"> • Sports Provision- 4 Global’s Report and maps indicates that neighbouring authorities to the east- Chelmsford and Brentwood were not fully considered when looking at catchment for sports facilities and amenities in Ongar, which traditionally (for over 1000 years) serves the surrounding villages and settlements in the rural north east of Epping Forest District. This would affect inward use of EFDC facilities and also a loss to neighbouring authorities depending on the distance and quality, quantity, accessibility of competing facilities • There is no mention of cooperation relating to employment sites near Ongar to the east • There is little acknowledgment or strategic cross-boundary planning for expected increase in road traffic links to the East of the district such as via A414 linking to A12 and east coast ports, Dartford Crossing and new lower Thames crossing, Crossrail at Shenfield. Increased traffic will be due to increased housing and employment around Harlow, but also increased housing and employment at Chelmsford and Brentwood. The major additional Thames Crossing is likely to increase traffic flow on a

**Ongar Neighbourhood Plan
Community Group**

	route such as A12/A414 to avoid M25 (but hopefully not through Ongar High Street!) and it is unclear how the opening of Crossrail at Shenfield will increase commuter traffic from Ongar and the west of Ongar
	Issue 3 Question 2
Effects of Garden Towns on Ongar	Transport infrastructure will not just affect the immediate vicinity of the Garden Towns, but delivery and commuter routes further afield affecting Ongar. The A414 dissects the civil area between the settlements of Shelley and Chipping Ongar. The roundabout is nearing capacity now. Concern is shown by the lack of forward planning by Essex Highways who seem to take a ‘wait and see’ approach to traffic congestion
	Issue 4 Question 1 and Question 2
	Issue 4 Question 1
Flaws in pursuing dispersed pattern of development suggested 7 years ago at neighbourhood level from a small return of answers (c. 400 to Ongar questions) and without knowledge of the total numbers to be allocated	<p>At present, Ongar is not a ‘sustainable’ location for development partly due to lack of employment and public transport. Achieving Sustainable Development in Ongar and applying the NPPF paras 8-10 are particularly important for Ongar. Para 9 states “to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system. The planning system should play an active role in guiding development to sustainable solutions.”</p> <p>The ‘dispersed pattern’ of development as a result of Community Choices 7 years ago, is also applied within the civil area of Ongar. We would argue that this is flawed, because we are talking about approx. 590 in the Local Plan and an additional 100-150 being built now. This total MUST be considered as a whole when applying the NPPF Sustainability appraisal values and the effect on Ongar, rather than as individual piecemeal sites that come up over an unplanned and longer period.</p> <p>The dispersed pattern of sites allocated by EFDC for Ongar is flawed</p> <ul style="list-style-type: none"> • The choice of small sites versus larger sites of development was asked. However making such a choice before knowing the total number of homes to be accommodated in Ongar was decided, makes no sense. In this case the justification for larger mixed sites is that it makes the soundest place shaping/urban design principles for its future increased population. The NPPF was supposed to be getting away from poor planning decisions of the past with a more holistic approach! It is likely that no-one in Ongar envisaged such a large number of new homes would be expected. This will increase the housing stock by approx. 1/3rd between 2011-2033, because there is <ul style="list-style-type: none"> ○ few and declining employment sites, ○ poor public transport and the Epping Ongar Railway is uneconomically viable to reinstate as a commuter service...despite still appearing in various EFDC documents as a possibility! • The locations and sizes of these allocated housing sites will not provide sustainable development in Ongar. <ul style="list-style-type: none"> ○ Most are too far from the Centre to walk and ○ the sizes and locations will not be able to provide the collective community facilities and amenities and other infrastructure identified as essential in EFDC Infrastructure Delivery Schedule

**Ongar Neighbourhood Plan
Community Group**

	<p>and would not necessarily be the best locations.</p> <ul style="list-style-type: none"> ○ Furthermore there is no land allocated to provide the essential facilities as listed ● This shows a complete lack of Space Shaping/urban design basic principles and would be detrimental to the existing settlement rather than enhancing it. NPPF Para 8 makes clear the economic, social and environmental roles and para 9 states “Pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people’s quality of life...”
<p>Issue 4 Question 2</p>	
<p>Limiting Negative effects of development on Green Belt criteria and historic environment in Ongar</p>	<p>The negative effects in relation to the Sustainability Appraisal objectives as stated for Ongar, refer in part to Green Belt Review results particularly “to preserve the setting and special character of historic towns” Parcel DSR-023 a large area to the East of Chipping Ongar attributed incorrect information about the shape of Chipping Ongar historic town centre to be linear, as did the smaller parcel of 0.23.2. Chipping Ongar is in fact a medieval plantation town beside a motte and bailey castle, all enclosed in a typical near circular medieval town enclosure.⁴ The shape still remains today. However the Conservation Area of the Town Centre also includes some post medieval development running just north and south from the town gates. It is only the more Modern developments mainly in the last 50 years that has given Chipping Ongar its dumbbell shape. The centre part of this still retains the castle motte and bailey on the East and associated typical medieval street patterns. This mistake was clearly not made by a historian, but has not been corrected. The Green Belt Review has therefore unacceptably dismissed the entire East and South East side of Ongar for more thorough investigation that the various site suitability went through, including looking at smaller sites within the Parcel of DSR-023 and how they performed individually. When considering the SA Appendix IV Site Selection Method Criteria 1.8a there would have been an opportunity for some of the smaller sites within the large Parcel to enhance an Ancient Monument by making it more visible and accessible and also enhancing the overgrown surroundings, which in no way serve the purpose of having look-out views to the surrounding countryside. Our conclusions are that sites were dismissed rather than giving the Landowners the opportunity of avoiding negative effects. Thus the most suitable sites may have inadvertently been eliminated. The negative effects of settlements merging are not addressed at all, because of incorrect application of NPPF principles of the Green Belt. Furthermore we believe that the proposal to take Great Stony Park Conservation Area out of the Green Belt should not go ahead. It forms an important barrier between the two settlements of Chipping Ongar and Shelley. Such an action would also be likely to see a relaxation of building restrictions in the housing estate, which only has a very small gap until Shelley (just over the A414)</p>

2957 words

⁴ See Appraisal of Chipping Ongar Town Centre Conservation Area 1998 Maria Medlycott