

**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:	Matter 4 The Spatial Strategy/Distribution of Development Issue 2 Question 3
Silence about employment opportunities in Ongar	<p>Second tier Settlement hierarchy for Ongaris justified generally. However, the Local Plan has no employment opportunities in Ongar. This needs to be addressed in the Local Plan because of the Green Belt surrounding Ongar would need to be changed to accommodate more employment land.</p> <p>Ongar has lost considerable employment space on multiple sites over the last 10 years to residential use. 95% of the increased number of workers in Ongar between 2001 and 2011 work outside the area (ONS Census information). There is a danger that Ongar will become a dormitory commuter town unless more local employment sites are found within or close to Ongar. Lack of employment heightens the need for enough school places, health services, day to day needs and leisure facilities and amenities to retain a cohesive community. Worryingly, under the present financial climate some of the desirable identified amenities may not materialise for some time.</p>
	Issue 3 Question 1
Commuter traffic concerns not met relating to employment in North Weald	<p>There is concern that the level of commuter traffic to employment sites in North Weald has not been fully considered. A recent Consultation in Ongar by Essex Highways about plans to improve the A414, which dissects the civil area between Chipping Ongar and Shelley, is grossly insufficient because it is nearly at capacity at peak times already and does not consider increased Commuter and delivery traffic will undoubtedly use the A414 through Ongar and also Ongar High Street. The latter is already a concern for Ongar residents in a number of ways including</p> <ul style="list-style-type: none"> • being detrimental to the attractiveness of the historic town centre, reducing footfall so having an adverse effect on the local economy • causing poor air quality for residents and shoppers and • harming the foundations of the considerable number of Designated Heritage Assets in the Town Centre Conservation Area of Medieval origin. <p>Development in EFDC Local Plan locates 400 homes adjacent to the A414 close to that roundabout. We have concerns about the subsequent air quality for new and existing residents in the vicinity. There is no Policy to mitigate harmful effects to health. Site allocations close to this busy junction will positively result in health issues for existing and new residents.</p>
	Issue 4 Question 1 Question2 and Question5
	Issue 4 Question 1

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<p>No Brownfield Register</p> <p>Too high density on recent Brownfield sites in rural area</p> <p>Increase in windfall sites</p>	<p>(c) i. We acknowledge that EFDC cannot accommodate the Housing allocation without releasing Green Belt land and that the land available in the urban south part of the district is limited. In Ongar, despite some aspects that need addressing to make housing development ‘Sustainable’, some new housing and employment sites would make the town more economically viable and self-sufficient. However, EFDC has informed us that they do not have a comprehensive Brownfield Land Register for the Ongar area. ONPCG identified a few, mainly small, brownfield sites in Ongar civil area that appear not to have been included in any site selection process. We suspect that a similar survey of other parts of the District would identify enough to be able to reduce the release of some Green Belt land or Open Space.</p> <p>(c)ii. Too high a density on recently developed Brownfield sites within Ongar is not in keeping with the character of the rural Historic Town Character especially at edge of Settlement sites, negatively affecting the Openness of the Green Belt and the character of the landscape. Thus there is also a danger of cramming too many homes onto land that then creates homes with poor ‘residential amenities’ leading to future social problems.</p> <p>(c)iv. Since the call for sites in EFDC and general publicity, Ongar has already seen an increase in the number of windfall developments coming forward and being developed in addition to those in the Local Plan.</p>
<p>Issue 4 Question 2</p>	
<p>Major concern on inconsistent and incorrect assessment of individual small sites relating to Green Belt purposes 1 & 4 and weighting relating to similar Historic Environment Assessments</p>	<p>The first consideration relating to development of Ongar, should have been how to achieve development that will enhance, not detracted from, its Historical significance in Chipping Ongar and Greensted in particular, such as with Masterplanning/Place-Shaping principles. This was not done.</p> <p>Historic Chipping Ongar is surrounded by Green Belt as are its neighbouring settlements of Shelley, Marden Ash, and Greensted. Release of Green Belt to enlarge the civil area of Ongar by approximately a third, should respect the shape and history of Chipping Ongar Town Centre (see appendix 1)to ensure that its future does not harm its identity and enables it to thrive in a ‘sustainable’ way with essential day to day services and amenities etc. within walking distance. This also includes preventing Chipping Ongar merging with neighbouring settlements, including of Shelley. This has not happened in this civil area of Ongar.</p> <p>The majority of Public Consultations responses for the EFDC Local Plan objected to the sites in Ongar by a large margin.</p> <p>There are several flaws in the Green Belt Review analysis which adversely affect Chipping Ongar. These arise partly because</p> <ul style="list-style-type: none"> • Such large parcels are analysed first, but the criteria not reassessed for confirmation when much smaller individual sites are processed in the site selection. Thus incorrect information and broad averages for a large site resulted in incorrect results for small sites in some situations. <ul style="list-style-type: none"> ○ In Chipping Ongar this resulted in different scores given to two large Parcels adjacent to the historic town centre broadly to the East and to the West sides and wrapping round to the South-DSR-023 and DSR-024, which should have scored the same overall score relating to 4th Purpose of the GB (NPPF) “to

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	<p>preserve the setting and special character of historic towns”.</p> <ul style="list-style-type: none"> ○ This anomaly is further compounded because of the weighting given to the Green Belt Review AND the ‘Impact on the Historic Environment’ criteria SA 1.8a and 1.8b which further penalises any site near Heritage Assets without further investigation about whether there might be an opportunity to enhance rather than harm the significance of the Heritage Asset and its setting by means other than Housing on part of the site. In our opinion, some sites in Ongar should have gone through for further assessment . Instead they were rejected on inconsistencies and inaccurate data attributed to the early stages, which were never rectified. ○ [Questions were raised about multiple errors in the Green Belt Review including in Sept 2017 Council Meeting when John Collins (not from Ongar) asked the Portfolio Holder Cllr John Philip for the sites to be rechecked against the agreed set of criteria with consideration being consistent across sites. This was refused as it was deemed unnecessary...] ● Purpose 2 of the Green Belt ‘to prevent neighbouring towns merging into one another’ was only considered in the literal sense for ‘town’, whereas, particularly in rural areas such as the nature of the north east region of EFDC preventing coalescence between neighbouring distinctive settlements and villages is applied elsewhere in Essex. The District Council ward for Ongar covers three settlements: Chipping Ongar, Marden Ash and Greensted. They are distinctive and different settlements. There is even a separate District Council ward for the settlement in the north - Shelley. However, this is not acknowledged in the scoring criteria, suggesting that there is not enough local knowledge by the Consultants appointed for this assessment. (see later explanation of the misuse of the names Ongar and Chipping Ongar) The large Parcels DRS-016 and parts of DRS-023 and DSR -024 include individual sites that if developed would cause the merging of Chipping Ongar and Shelley. These sites ONG 1, ONG2 and ONG4 are now in the Local Plan against strong local opinion during the EFDC Local Plan consultation process and also again collected more recently by ONPCG during our community engagements for Ongar’s Neighbourhood Plan. <p>The Green Belt Review results have been weighted and added to the site selection process leading to some site allocation for Chipping Ongar that would harm the very core of the historic town, detracting from its history and development in the medieval and post medieval periods; and threatening the economic recovery and viability of the town.¹</p> <p>Concluding, the contribution made by individual sites has not provided a robust assessment of the Green Belt (EB704A-B and EB705) as applied to Chipping Ongar and to some extent Shelley, Marden Ash and Greenstd. Individual sites</p>
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See Appendix 1 Medieval Town Enclosure and Chipping Ongar Town Centre Conservation Area Map from Maria Medlycott’s Appraisal of Chipping Ongar Town Centre Conservation Area 1998

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	<p>need to be reassessed together with amendments of the combined weighting/double weighting of such elements as Historic Environment within both Green Belt and as stand-alone criteria within the SA. Perhaps AECOM should have tested whether the criteria used in other Reports such as The Green Belt Review stages I and 2 are sound. Our opinion is that they are not sound and therefore produce inconsistent results.</p> <p>There seems to be widespread confusion in EFDC Local Plan and supporting evidence documents about the use of the areas of “Ongar” and “Chipping Ongar”. They are NOT the same or interchangeable. As stated previously in this Statement, Ongar is the civil area of four settlements. Chipping Ongar is one of those settlements and the only one with a town centre and is essentially the medieval town area as in the Town Plan above.</p> <p>Green Belt Review also has incorrect information about Chipping Ongar, whose Historic centre is incorrectly described as ‘Linear’ (see Appendix 1 showing Chipping Ongar town map). Its erroneous reason not to develop around the core as it describes, has led to the site selection process being seriously flawed for Ongar. Thus a number of sites were discounted early in the selection process which should have gone forward to at least more stages.</p> <p>We respectively request the Inspector to look into these anomalies and instruct the information to be corrected and sites reassessed accordingly. Sites particularly in question are relating to Ongar within EFDC Green Belt parcel DSR-023 DSR-024 and DSR-016. Chipping Ongar Town Centre is of medieval origin with a planned ‘plantation town built beside the 11th century Motte and Bailey castle and within the medieval town enclosure area still in evidence today. Medieval town plans like Ongar were not linear. Some ribbon development came later- north and south of the town gates. This medieval town plan largely remained until mid-20th Century. (see appendix 1 below)</p>
	<p>Issue 4 Question 5</p>
<p>The dangers of not identifying safeguarded land for future development</p>	<p>ONPCG are uncomfortable about the lack of safeguarded land between built up land and the Green Belt. EFDC should expect to accommodate more development beyond 2033. Without safeguarded land allocated, our small rural town is fearful that we might be fighting against developers in the future. Without a continued 5 year supply of land, EFDC has recently suffered from developments which involved loss of employment land and other unsuitable locations, including in and just outside Ongar. We would prefer proper forward planning and safeguarding of preferred locations accordingly to prevent this type of unscheduled and indefensible development taking place post 2033 or near the end of this Local Plan period. Should the Inspector instruct EFDC to identify Safeguarded land Ongar Neighbourhood Plan Community Group would want to be kept fully informed or involved with the process and consulted on any land being considered for Safeguarding in and around Ongar. This would also be important for consistency with the drafting of Ongar’s Neighbourhood Plan</p>
	<p>Issue 5 Question 1 Question 4 and Question 5</p>
	<p>Issue 5 Question 1</p>
<p>Up river</p>	<p>Ongar already suffers with flooding of the Cripsey in part of our historic</p>

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affecting existing flood zone dwellings	residential area of Chipping Ongar. We are not convinced that the areas up-river of the Cripsey, and to some extent the Roding, have been adequately assessed for new housing up-river, with respect to the effect on Chipping Ongar down-river and allowing for climate change, including more frequent heavy downpours leading to flash flooding.
	Issue 5 Question 4
Concern over sufficient water supply capacity	A number of areas in Ongar have reported low water pressure from time to time and the regular need to clear or repair blocked drains, including Chipping Ongar High Street. By increasing the demand by approximately 1/3 rd in Ongar alone, due to the increase in housing of 800 from 2011 to 2033 or earlier, we would welcome the insistence of following the Environment Agency recommendation.
	Issue 5 Question 5
existing waste water drains concerns	We want assurances that the Sewage Treatment Works serving Ongar has appropriate infrastructure in place early in the Local Plan period as our development sites are expected to be delivered by 2026.
	Issue 6 Question 1 and Question 5
	Issue 6 Question 1
Effects on Ongar roads from growth in the wider area, including beyond EFDC	<p>ONPCG does not believe that Essex Highways have considered the wider picture for Ongar i.e. the accumulating effect of more development at Harlow, Gilston Garden Town, North Weald, and nearby Chelmsford. Uttlesford, Harlow. Brentwood etc. on traffic and congestion on roads through Ongar, including A414, A128, A184 and A113. During a recent exhibition about the upcoming improvements to A414, which is approaching capacity, it is clear they take a ‘wait and see’ approach to traffic on less priority roads. For more than 20 years, Ongar has suffered effects of congestion. There are no immediate plans for other improvements in the civil area. These are some of our concerns not yet addressed:</p> <ul style="list-style-type: none"> • There are only 3 points to disgorge the additional traffic from 600 new homes onto the A414 and A184 (High St) • Essex Highways have –to date- not answered requests to plan for safe routes to our three schools or to improve drop-off places as part of strategic planning. • The environment and congestion around the new Academy and Health Centre, with inadequate pedestrian safety has not yet been resolved as safe environments for children and patients, despite both new facilities being open for several years. • The congestion at the Four Wantz on the A184 at school finishing times has not even been included in the proposals for improvements on the three other approaches to the roundabout junction with the A414 <p>Ongar expects increased commuters traffic from developments in Ongar too, because of the lack of employment nearby. Public transport is poor. ECC and EFDC have not planned park and ride or other alternatives for those wanting to go by TfL underground from Epping etc. Additionally there is no provision for more car parking spaces at destination places e.g. Stations such as Epping</p>
	Issue 6 Question 5
Significant	EFDC Local Plan Infrastructure Delivery Plan (EB1101A&B) was only in its

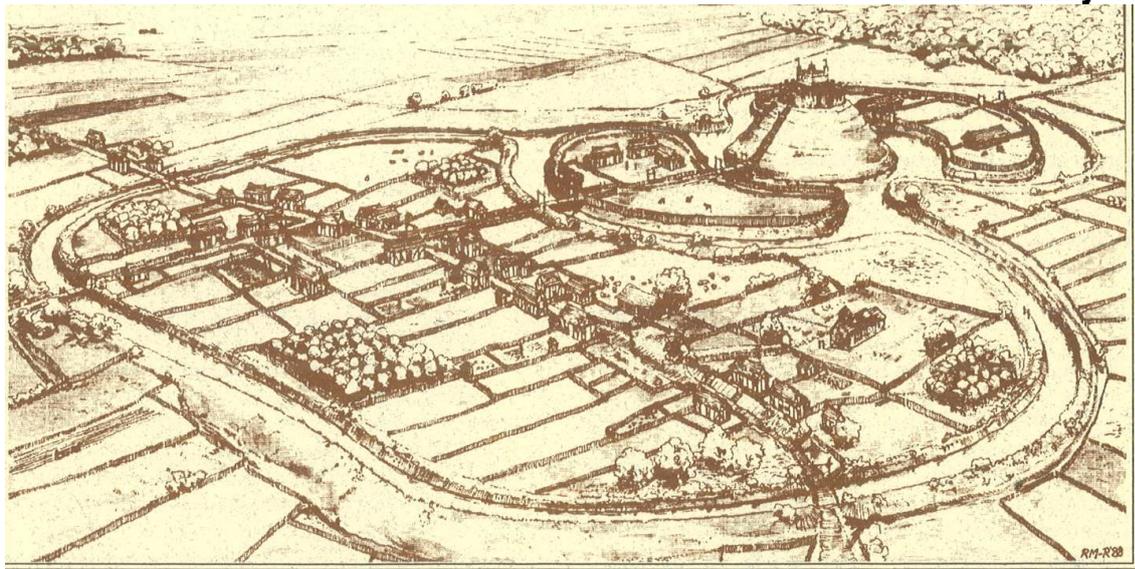
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<p>omissions and funding gaps for Ongar’s Infrastructure requirements</p>	<p>preliminary stages in Dec 2017 and still has a long way to go. ONPCG has been engaging with various bodies and delivery partners. For Ongar there are still significant omissions in funding such as:</p> <ul style="list-style-type: none"> • Early Years Education, which also will need to buy/acquire land for the purpose. Funding would be insufficient from the sites in Ongar • Secondary Education. The free school Ongar Academy have made it clear, and our Schools Representative would confirm, that despite being a new school, it cannot accommodate an expected increase in demand from children of new residents in its existing catchment area without new classrooms, and additional laboratories, larger assembly hall, library, more sports facilities and parking etc. It is unclear where funding would come from and when. • Health Facilities. Ongar Health Centre already has over 12,000 registered patients. There is insufficient car parking for the patient numbers during standard surgeries. This is exacerbated during clinics are also running e.g. blood tests antenatal. CCG have not communicated how this will be overcome, despite an expanded Health Centre use. Most sick people attending appointments are unlikely to walk there, even if they live close by. The obvious solution is for the adjacent land (which was previously part of the Cottage Hospital site) is reassigned from a Residential site ONG R3 to car parking for the Health Centre • About 14 ha of land is required for the ‘essential’ various Open Space, Sports related and Pre School and other Community Facilities requirements listed in the IDP for Ongar. It is not feasible for developers to provide most of these within their residential sites given their scale, and if they did so, they may not be the logical or preferred location for such community facilities and amenities. This land is not secured and the IDP requires it to be delivered before all the houses are complete. Thus funding would be required to purchase suitable land • The Leisure Centre will need upgrading or replacing during the Local Plan period. There is no indication of costings etc. <p>Ongar’s Neighbourhood Plan expect to be able to select what is provided and where it should be located relating to all new and upgraded Community facilities and amenities, Open Space and sports related areas etc. EFDC Local Plan should ensure that these decisions will be made by Neighbourhood Plans and Community Groups in the spirit of the Localism Act and Neighbourhood Planning Act.</p>
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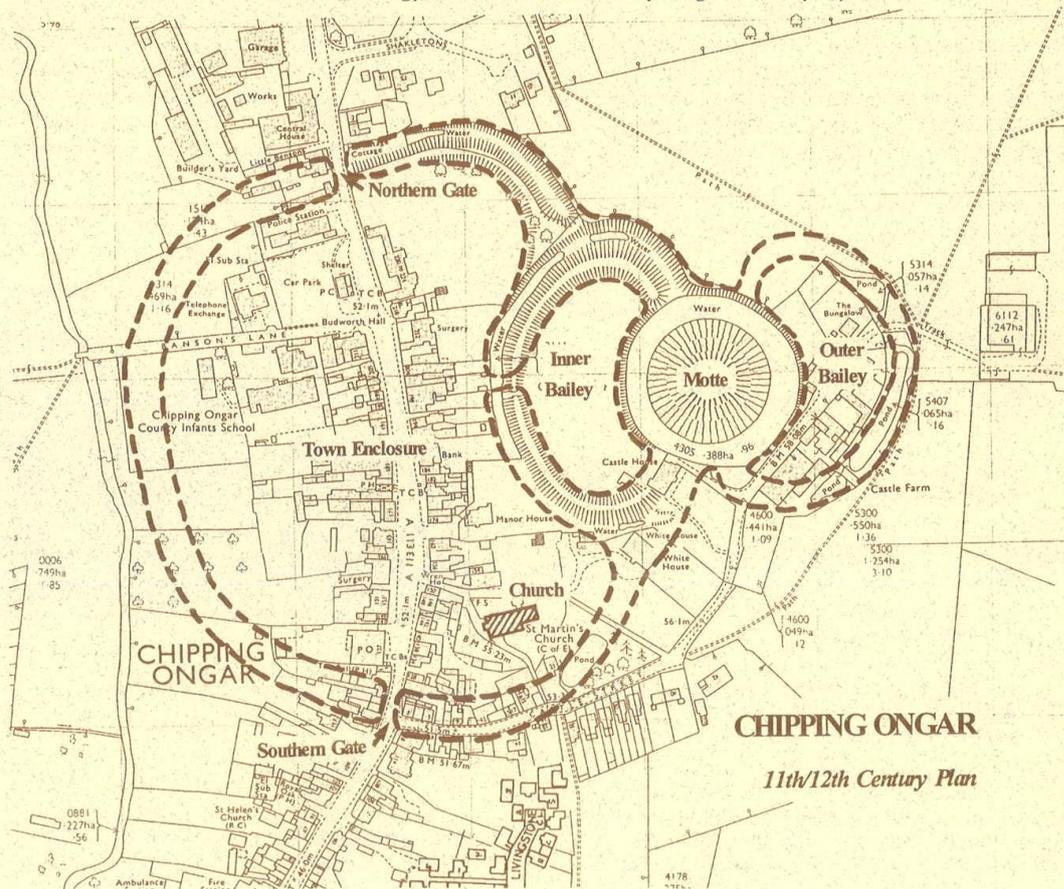
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Appendix 1 Medieval Town Enclosure and Chipping Ongar Town Centre Conservation Area Map from Maria Medlycott’s Appraisal of Chipping Ongar Town Centre Conservation Area 1998

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An artist's impression of the 11th century town with its new defences. (Reproduced courtesy of Essex County Council's Archaeology Section and drawn by Roger Massey-Ryan).



This plan shows the location of the original town defences in relation to modern day Chipping Ongar.