

Matter 15: Places and Sites

Issue 1

1. Question 1

- 1.1 Selection Requirements need to be enforceable, e.g. retention of hedgerows and trees, not harming the settings of Designated Heritage Assets, and mitigating harm to the natural environment, including providing green corridors.
- 1.2 Site specific requirements for Ongar of 'infrastructure' requirements such as open spaces, children's play areas, or other identified community facilities are not included. Will developers therefore omit them from the development? Input from Neighbourhood Plans should identify specific amenities and locations in line with the localism Act and NPPF.

2. Question 2

- 2.1 Ongar sites will not provide the land or the funding for even the open spaces and pre-school identified 'essential' provision in the IDP. Most community facilities would be more accessible close to the centre of Chipping Ongar, but still would require land acquisition.
- 2.2 At what point will the funding be available and the amenity delivered for jointly funded amenities by developers building at different times? How will this comply with NPPF?

3. Question 4

- 3.1 Due to existing land use, some allocated sites for Ongar will have difficulty in providing pedestrian and cycle routes/links as short cuts to discourage local car journeys. Different sites in better locations such as east of Ongar could easily resolve this problem.

Question 6

- 4.1 Ongar sites are not large enough to accommodate pre-schools and other community facilities listed as "essential" in the IDP.

Issue 2

Policy P4: Ongar

1. Question 1

- 1.1 All sites for Ongar civil Parish are edge of settlement, in Green Belt with generally High or Very High rating of Harm and Land Characterisation of high sensitivity to change. ONPCG strongly contends that the allocated density for Ongar should respect the rural nature of the existing landscape. Instead there is a crude method to calculate density for Ongar EB805j table 2, ignoring the historic town and importantly its setting. An average 40pha is out of character with the rural neighbourhood and would be detrimental to the historic town of Chipping Ongar, (by far the smallest town in the district with only 1482 electors in 2019¹) and surrounding settlements.
- 1.2 A more appropriate density would be 24 pha maximum at edge of settlement and maximum of 30 pha in the town centre, as has been allocated in other districts e.g. Waverley and in other parts of EFDC (North Weald Masterplan nearby is only 20pha and Fyfield is 16pha). Applying this would obviously require additional sites in Ongar to accommodate approx. 224 new homes. ONPCG have been in talks with local Landowners and are confident that suitable sites are available with similar scores to the original allocated sites, once the inaccuracies have been corrected.
- 1.3 Such density would also enable the existing mix of size of homes as of 2011 to be retained providing enough homes for families. 40pha is more suited to young professionals, whose lifestyle is more urban related with nightlife, bars and clubs etc. and living within easy commute of London, rather than our quiet countryside with few entertainment facilities.
- 1.4 Sites R1-4 and R6-8 are in the wrong places to enhance our historic town. The site selection for Ongar was flawed in
 - its preferred spatial direction for expansion, which discounted sites to the East on spurious grounds without undertaking a Historic Impact Assessment as stated by HE
 - inaccuracies in data and applying criteria to individual sites
- 1.5 The district consists of settlements of very diverse nature. No consideration was given to how the very rural historic town of Chipping Ongar might actually benefit from these new homes, rather than destroying its unique character through badly placed sites and high density. The Local Plan indicates no local knowledge or understanding of what is needed to make Chipping Ongar a thriving local economy once more. ONPCG has a more realistic Vision based on local knowledge.
- 1.6 Raising Chipping Ongar's historic profile and tourism offering are paramount. Additional community facilities and amenities must be located centrally. New housing must be within

¹ EFDC Electoral Services

easy walking distance of Chipping Ongar centre and be of low density, low rise with green space, trees and hedgerows within new residential areas, thus respecting the exceptional Green Belt and Characterisation of the Landscape they will have to be built on.

- 1.7 Ongar's Neighbourhood Plan Group has been refused meetings and discussions with the Local Plan Consultation Team to put forward such proposals, which involved making some changes between the Draft and Submission Versions. It would appear that at least Epping was able to do so with some success, if not others. EFDC have stated that changes can now only come with your specific instructions. Hence we will make specific proposals for your consideration.
- 1.8 Furthermore, any Green Belt earmarked for future development round Ongar must be safeguarded now and with discussion with ONPCG on how this would contribute to a more vibrant community. It must not be forgotten that Ongar has little local employment and no rail links to London. Its other attributes must be enhanced so that it does not become merely a dormitory town.
- 1.9 Ongar Neighbourhood Plan is well advanced and nearing Consultation stage. Over the last two years with our Planning Consultant: - EFDC proposals have been scrutinised, research carried out and the community consulted. Our findings indicate that R1-4 and R6-8 will not be beneficial to the development of Ongar, but other sites would be.
- 1.10 Ongar is not against development, but only if it respects the character of its historic core Chipping Ongar and the rural nature and land characterisation that is highly sensitive to change.
- 1.11 AECOM is on board through Grant Funding and a Consultant Town Planner. ONPCG consider that it is appropriate for us to be able to reassess the Ongar sites more thoroughly and allocate residential sites for our Neighbourhood. The NPPF strongly supports this action enabling local people with local knowledge to shape their growing communities. The Local Plan also does permit Neighbourhoods to bring forward sites for development, although we have been told they would be additional to the 590 allocation!
- 1.12 We are advanced with our work, so site selection should not delay the deliverability of new sites being delivered, once they are approved and Green Belt boundaries altered.
- 1.13 EFDC have stated that all residential sites are "strategic" policies. However, as previously said in other statements, EFDC changed sites from the north of Chipping Ongar to the south of Chipping Ongar between the draft Plan and the submission version, so this cannot be the case for Ongar P4. We consider that sites in Policy P4 are only strategic in that timescale for delivering them remains the same thus not affecting the 5 year land supply and trajectory.
- 1.14 We are confident that any changes of residential sites will not alter the time scale set for Ongar's delivery.

2. Question 2

**Ongar Neighbourhood Plan
Community Group**

- 2.1 Ongar Neighbourhood Plan has emerging policies to support a regeneration of the town centre of Chipping Ongar with diversification to include services and recreational pursuits. We consider that EFDC Policy P4 G is sufficient to ensure protection of a good mix of retail. Chipping Ongar has mainly small burgage units, unsuitable for multiple or large retailers. As a small centre, anything below a critical number would be detrimental to the survival of the shopping centre, which has suffered severe decline over recent years following the relocation out of Chipping Ongar of the Health Centre, closure of the Doctors surgery, closure of the police Station, demotion of the Fire Station and Post Office, closure of the Banks, closure of longstanding retailers and fresh food outlets.
- 2.2 Sainsburys is treated by customers as an out of town store. Shoppers park in its car park, shop in the store, return straight to the car and drive off. There is no value in including Sainsburys in the Primary Frontage. It is not on the High St. Inclusion would skew the total, which is mostly small frontages and inadvertently permitting change of use from A1 to that below a critical number for overall viability of the shopping centre. Thus we are strongly against this suggestion.

3. Question 3

- 3.1 There are more urgent needs for Ongar's community than allocating land for a new cemetery. These include allocating land for the community amenities identified in the IDP as "essential" for the living and new residents, and those that are "desirable". Examples are football and other sports amenities, a pre-school and a town park and regenerating Chipping Ongar's local economy.

4. Question 4

- 4.1 Our main concerns relating to vehicular access are:
- There must not be any possibility of any through traffic into the proposed estate or using this as a route to by-pass the 4 Wantz roundabout.
 - If there is only one vehicular access at The High Street, is this too close to the 4 Wantz roundabout?
 - Will just one access be sufficient for commuter traffic, in particular, to join the main road, without undue delay? This is particularly relevant because of the higher than average use of private cars due to the location of Ongar, with no train link to London and little local employment.
- 4.2 There must be a robust binding Policy to ensure that developers contribute and deliver what the community needs (i.e. in addition to the schools, waste water upgrade, highways upgrade etc.). However, both Landowners/Agents for R1 R2 are already requesting a relaxation or flexibility in contribution to infrastructure requirements, **suggesting that criteria set is making the delivery unviable economically for sites R1 and R2.**
- 4.3 The site selection process has been erroneous for R1 and R2 as follows:
- The Green Belt Review initially looked at two large parcels of land DSR 023 and DSR024 round the east and west of the civil area of Ongar. Both should have the same effect adjacent to Chipping Ongar historic town but the east was higher rated, possibly due to its smaller size. In awarding the criteria of harm to the Green Belt aspect 2 'preventing settlements merging', only the village of North Weald to the west and settlement of High Ongar to the east were considered. But Shelley, a separate settlement (also in the Domesday Book) lies to the north, beyond the A414.

Developing R1 and R2 would cause coalescence of Shelley and Chipping Ongar so should merit a 'strong' rating for purpose 2 (EB705A p27). The historic Chipping Ongar boundary is at the A414 and this small amount of Green Belt is also essential in "preserving the special character of the historic town" purpose 4 so should also rate 'strong'. The summary should have been rated Very High relating to harm to the Green Belt.

- b. Air quality would be expected to be poor on sites adjacent to a main road. This was the reason for a rejected site to the SW of Marden Ash based on its proximity to a main road A113 (although in that case the site was nowhere near the A113...another error!) R1 and R2 are adjacent to the A414, which is busier than the A113 and expected to become more so. The A414 4 Wantz junction is already at 90% capacity (Essex Highways traffic survey Jan 2017) resulting in queues of traffic at times, with associated exhaust emissions. The development planned in Harlow etc. will increase traffic to Chelmsford and A12 and east coast ports including for HGVs. Thus homes alongside the road will have poor air quality, which will be detrimental to residents' health.

R1 and R2 should be removed from the allocated sites for the above reasons of incorrect site selection and suggestion of possible uneconomic viability from the developers.

5. Question 5

- 5.1 As per previous Statements, the new Ongar Health Centre relocated to Shelley, already has 12000 patients registered from the civil area of Ongar (pop 6251 in 2011) and the surrounding villages and settlements. It has surgery rooms for doctors and nurses and also holds a variety of clinics such as for diabetes, pre-natal, blood tests, inoculations etc. There is no room on site for expansion of the carpark.
- 5.2 Car park spaces for patients (and staff) are very limited. Many patients live too far away to walk to the surgery, or are too ill to walk. There is already an issue with patients trying to find spaces in local residential streets and on the grass verges in Fyfield Rd. Posts have now been mounted to prevent parking. Historically ONG R3 was mostly part of the grounds of the old war memorial hospital.

R3 should be removed from the allocated sites for the above reasons of alternative use being necessary for additional car parking and enabling further expansion of medical services in the future.

6. Question 6

- 6.1 As previously stated, the Four Wantz Roundabout is already at 90% without considering additional traffic from developments in the Local Plan. Further west, there are plans for dual carriageway. This is not feasible in this location due to the recent development 'Walter Mead' right on the roundabout.
- 6.2 Existing residents adjacent to R4 already have difficulty turning towards Ongar at peak hours. New homes here (and at R1 and R2) would increase the traffic from nearly 400 new homes.
- 6.3 This site will also close the important Green Belt gap between Chipping Ongar and Shelley, thus against Green Belt policy aspect 2, causing settlements to merge and harm to the setting of the historic Chipping Ongar.

R4 should be removed from the allocated sites for the above reasons of incorrect site selection.

7 Question 7

- 7.1 This part of the busy A113 is notorious for speeding in both directions, with a number of accidents regularly reported. The 30mph was recently moved further south but is unenforced. Access for another 33 homes and associated cars would add the likelihood of more accidents.
- 7.2 Sites R6 R7 R8 are all unjustified in being added to the Local Plan at the reg. 19 stage.
- There was no local consultation
 - The sites are not in sustainable location for access to local amenities: Chipping Ongar centre is over 1.3km² with a busy road to cross; there are no amenities or open space nearby in Marden Ash; the secondary school and health centre and leisure centre (over 2.5km) are too far distant to encourage walking including the primary school just over 1km
 - Other sites to the East of Ongar are more suitable
- 7.3 Marden Ash House Grade II* and Dyers Grade II listed, both have important Settings. Dyers in particular would have its Setting harmed by development at R6 and R7. This cannot be appreciated without a site visit into the grounds of Dyers.
- 7.4 **R6, R7 & R8 should be removed from the allocated sites for the above reasons of incorrect site selection and replaced with alternatives close to the centre of Chipping Ongar such as to the East.**

8 Question 8

- 8.1 See also Question 4 above. Purpose 2, 3 and 4 have contributions from sites round Ongar, with very similar contributions for 3 and should have similar contributions for 4 on all sites adjacent to the boundary of Chipping Ongar historic settlement.
- 8.2 We dispute the use of the crude assessments of two large parcels round Ongar in that DSR 023 and DSR 024 which was a major factor in dismissing development to the whole of the East of Ongar.
- 8.3 Fig 13 of EB704A shows the Green Belt parcel DSR 024 extending on the west of Ongar and along the boundary with Brentwood and reaching as far south as Buckhurst. Even for this size the average findings for purpose 4-setting of historic town rate a contribution although relatively weak. However in close proximity to Chipping Ongar it must be similar to the east side so should be 'strong' for all sites adjacent to Chipping Ongar. DSR 023 presumably merits the higher rating because it is a much smaller parcel and includes proximity of Chipping Ongar and High Ongar Conservation Areas.
- 8.4 Purpose 2 has been incorrectly accounted for for parcels 013.2 and 013.3 (R1 and R2) and 016.1 (R4) (EB705A). As stated above, EFDC consider settlements of North Weald village and High Ongar important in preventing coalescence with Chipping Ongar, but ignore the problem of coalescence with the separate settlement of Shelley just north of the A414. In R1 R2 R4 cases important gap would be closed.
- 8.5 In short EFDC Local Plan is fundamentally flawed for Ongar. The bland Vision shows that EFDC has no idea of the distinctive characters within the civil parish of Ongar or even what and how many settlements make up the civil area known as Ongar. Neither has it researched its aspirations. The only consistency is that the key evidence papers do not

² From Marden Ash House just north of the access to the proposed R6 site to all stated locations. source Google Maps

appreciate that the town is Chipping Ongar, which is of medieval origins. It is NOT synonymous with Ongar.

- 8.6 Chipping Ongar is, however, close to the separate and different distinctive settlements of Shelley, Greensted (both also noted in the Domesday Book) Marden Ash and High Ongar. They are all surrounded by Green Belt and it is important to our communities that these settlements do not merge. High Ongar remains in a different civil parish and these concerns of not permitting (Green Belt) development that will let High Ongar merge with Chipping Ongar are addressed in the Local Plan, but NOT the settlements of Shelley and Chipping Ongar, which are now in the same civil parish (but historically were not. Chipping Ongar, Shelley, Greensted and Marden Ash remain four distinctive settlements in the civil Parish of Ongar.

Summary

- Density for Ongar should be reduced to 24pha maximum at edge of settlement and 30pha in town centre to protect the character of Chipping Ongar historic town, with a greater area to be released from the Green Belt accordingly
- Site Selection should be reassessed by ONPCG with AECOM but with assurances that delivery of any different sites will be in accordance with the Local Plan delivery trajectory.
- In particular sites to the east of Ongar should be reassessed with corrected information.
- A better selection of housing allocations could contribute to a much more reliable and effective delivery of the amenities identified in the IDP and also enhance the ability of Ongar Neighbourhood Plan to achieve its Heritage and Tourism goals as identified in Arup's settlement Proforma EB8010, which incidentally, has been largely ignored in the Local Plan.

ONPCG

**Ongar Neighbourhood Plan
Community Group**

ONPCG *working with Ongar Town Council to produce a Neighbourhood Plan for Ongar*

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