

## **Matter 5: Site Selection Methodology and the Viability of Site Allocations**

### **General comments**

- 1.1 The site selection process as relating to Ongar sites has:
- Factual errors and inaccuracies in describing some of the sites
  - The assessments of all the Ongar sites shows serious inconsistencies of approach and therefore scoring
  - The criteria for suitability was changed when the numbers were not high enough to fit EFDC allocations
  - There appears to be little understanding of Chipping Ongar's historic relevance and original town plan and that it is a rural town not an urban town.
  - There is confusion over the differences between Chipping Ongar and the civil area of Ongar-the latter constituting 4 different settlements of :-Chipping Ongar, Marden Ash, Greensted and Shelley, with maps incorrectly labelled by a variety of external Consultancies.
  - There is no comprehensive Place-shaping or Masterplanning evident, which should have been carried out due to the expectation to increase the housing stock by approx. one third during the Local Plan period of 2011-2033. This large number was in fact not really verified until very close to the production of the draft Local Plan, thus surprising Ongar's community.
- 1.2 EFDC are under a misunderstanding that increasing the housing for Ongar will make it sustainable and self-sufficient, clearly not understanding other factors that will prevent it becoming so.

### **Issue 1 Question 1**

- 2.1 A summary of the process as requested would be most welcomed, not least because the process of call for sites is understood to have started some 11 years ago in 2008. Since that date, the Government's expectations for growth in the South East and encroaching into the Metropolitan Green Belt has become clearer. Furthermore it is often difficult to trace back as to the reason any particular site was rejected. We have noticed various errors within descriptions of site details, where they have clearly not been checked and corrected with anyone with local knowledge or site specific knowledge. Some specific errors have also been brought to our attention by Landowners, which we list further on.
- 2.2 At the opening day on Tuesday, 12th February 2019, reference was made by several attendees concerned with Epping's allocations to the fact that some of the Epping sites had had errors attached to them at some stage in the Site Assessment. EFDC accepted those errors, had rectified them and the sites fully reassessed. We gather that resulted in changes to the ultimate site allocation by EFDC for Epping. As far as we can tell the errors in various Site Assessments in Ongar have not been corrected and the Sites have not been fully reassessed and notified as such. When this does happen, this could change the list of the most favourable sites for Ongar.

- 2.3 As far as Ongar is concerned, it is **only in the last few years** that EFDC have made it clear to our community how EFDC's allocations were decided. It was generally assumed that Ongar's housing allocation would have to be small due to the inability to provide 'Sustainable Development' in a location that had been losing employment sites and has no rail access to London's employment destinations. Any more than organic growth in Ongar would also require considerable investment in infrastructure including Highways improvements and alleviating through traffic; waste water and sewage upgrade; as well as the necessary and identified additional educational facilities etc. and more open spaces and sports and leisure facilities and amenities. (These additional identified Infrastructure for the extra population provided for in the Local Plan in Ongar, will also be difficult to fully fund from the relatively small residential sites allocated)
- 2.4 Implications of a supposed preference to several small sites instead of one or two larger sites would not have been fully explained to consultees nor did the possibilities explore of having one or two larger mixed sites. But the March 2013 Workshop 3 Notes (for District and Town/Parish Councillors)<sup>1</sup> who considered site locations ONG A ONGD and ONG G were of the opinion that only two areas should be developed rather than three and were looking at sites that were close enough to primary schools and the town centre or Shelley local parade to enable walking and cycling. The proximity to the town's facilities was a main factor in the descriptions made on p86-94 of EB131. It was not clear why the other areas of Ongar were not part of the Workshop process.
- 2.5 A Forum proposal put to Ongar Town Council and the district Councillors for Ongar in Sept 2014<sup>2</sup> related to promoting site areas ONG C and ONG F or parts thereof to supply the housing need and resolve the existing problems including that developing to the north of Chipping Ongar and south beyond Marden Ash that would turn Ongar (i.e. Shelley, Chipping Ongar and Marden Ash parts of the civil area) into a dumbbell settlement exacerbating traffic and parking problems in the town centre (of Chipping Ongar) Instead, developing to the west and east of the historic medieval town enclosure, but mindful to respect its setting, flood plains etc. 'would stop the town sprawling out into the open countryside and would in effect be infilling, producing a nucleated and cohesive settlement.' It is unclear what the outcome of these proposals were or how they fed into or were discounted in the production of the Local Plan Draft version or Submission Version.
- 2.6 It is also unclear how the, albeit only approx. 400, responses (including those from outside Ongar and unaffected by development in Ongar, such as the quoted North Weald Residents Association and High Ongar residents) were taken account of from Choices and Options Consultation Document 2012 EB131. Most were mixed sites offering residential, commercial and /or the possibility of well-placed community amenities and additional infrastructure needs, these larger options have not been carried through in site selection.

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<sup>1</sup> See attached Appendix 1 Local Plan Workshops Output from Workshop 3 pages 5

<sup>2</sup> See Appendix 2 Docs from Ongar Town Council

- 2.7 We are unaware of any Masterplanning and Place Shaping principles being applied to the development of Ongar. With an expected growth in housing stock and population of approx. one third within 8 years, we consider that this should have happened, particularly for a small town with a poor High St economy and little employment locally and no rail links for commuters to London. This was an important stage either missed out or not carried out fully and certainly not documented. Chipping Ongar town centre has already been identified in various reports supplied as evidence to you, as suffering a decline in viability. There was the opportunity within a Masterplan or Place Shaping, to develop sites that would improve the nucleus of the historic centre of Chipping Ongar and cohesiveness of the community and within walking distance of the High St, as well as laying the foundations for an enhanced tourism offering.
- 2.8 In EB 1313, 7 options were given with housing numbers for Ongar ranging from 0 to just over 1007. See Tables 4.11-4.18 pages 50-67. All the sites suggested for growth are beyond existing boundaries were described in pages 86-94 of EB 131 and are relatively large, being combinations of smaller sites. Furthermore mixed use and community facilities/amenities were also suggested and density assuming 30dph for housing so were able to deal with the issues of providing Sustainable Development without better public transport and links to London trains such as TfL Underground.
- 2.9 The civil area of Ongar has a small rural historic town of Chipping Ongar serving the rural settlements in the north east of EFDC but Ongar's employment offering has eroded over the last 20 years. Development is further restrained by Metropolitan Green Belt, Landscape Characterisation regarded as sensitive to change and two rivers with significant flood plains. However, there is acknowledged potential to enhance its tourism offering through its historic core and Ancient Monument in Chipping Ongar, the Epping Ongar Heritage Railway (which despite references in various EB documents, is very unlikely ever to be viable for any commuter links to Epping TfL underground station) Greensted Church and the Essex Way long distance footpath which crosses the civil area of Ongar E-W.
- 2.10 EB204 AECOM SA Report Dec 2017 Appendices p140 on
- Southern Expansion omits the concern that expansion in this direction would cause sprawl of the town and result in housing not close enough to walk in to the town centre or primary school.
  - Eastern Expansion treats this as a very large parcel in the Green Belt Review but should look at smaller sites in that area. No indication is made in the Local Plan Submission document as to the unsuitability of such a large tranche of land whether for housing, amenity space or employment.
- 2.11 EB805 page 19 looks at the spatial extent and suitability of strategic options identified at Stage 3 remaining unchanged for this stage, except in the following including:

- High Ongar - Infill with Limited Expansion. Plus the area in Chipping Ongar eastern expansion option '**to better align with the Council's evidence base**'. Being harmful to the Green Belt and landscape sensitivity
- Ongar - Southern Expansion: The suitability of this strategic option was also amended to more suitable to better reflect the Council's evidence base. This was in terms of GB rather than the important aspect of having homes built near to local amenities already identified!!

In other words these criteria have been changed

**In truth ALL sites round Ongar are harmful to the Green Belt and Landscape Sensitivity.** If the decision to build in Ongar still holds then they **MUST be in sustainable locations** and be able to accommodate the necessary open spaces, leisure and sports amenities which have been identified as being approx. 14ha in the Infrastructure delivery Programme or suitable sites for those identified in the centre of the town.

2.12 EB805 para 2.82 on page 27 once again shows the criteria is changed to permit more sites within areas of harm to the Green Belt etc. to be selected in Ongar under the false premise that this number of new homes is **necessary** for the town to be sustainable...but without employment and without rail connections to London?? Thus it is committing Ongar to a future as a dormitory town with no cohesive community unless a real effort is made in the Local Plan and funding available to provide good leisure and sports facilities and amenities and funding to regenerate the historic Chipping Ongar centre to make more of its tourism offerings. No such indication is forthcoming. Table 2.7 page 33/34 still states that suitable sites in Ongar is 5 yielding 88 homes, rather than the eventual 9 sites and 590 homes in the Draft and Submission versions of the Local Plan, which this document attempts to justify.

## **Issue 1      Question 2**

- 3.1 As previously stated, it appears that certain inaccuracies in some Epping sites were rectified and the sites reassessed.
- 3.2 We request that the same is carried out for the Ongar sites.
- 3.3 Some sites had unjustifiably high negative scores based on incorrect descriptions of the site. This led to some sites being rejected early in the site selection process and not comprehensively assessed, although it has also been difficult to find all the reasons to reject some sites.
- 3.4 The following sites include those rejected early on, possibly due to inaccurate facts in their descriptions; and others which have been given the go-ahead but without consideration of missing facts which could compromise the ability to provide the allotted numbers, or on further reassessment after correcting the descriptions, may have led to being rejected also:
- SR-0090 We are unable to find the reason for this to have been rejected and at what stage, after appearing in in the large Green Belt Parcel DSR-023
  - SR-0067ii Stating there would be the loss of a Heritage Asset where no known Heritage Asset is present in that field.
  - SR-0120 Ignoring the existence of an Heritage Asset on adjacent land being a Grade II Listed Building

- SR-00390 No mention of the High Pressure Gas pipe running across the site- according to maps from the National Grid (and reported to EFDC)
- SR-0268 Stating that it has poor air quality despite being nowhere near a main road
- SR-0120 No recognition of poor air quality despite being adjacent to the busy A414
- SR-0315. This appears to have been assessed only in the large Green Belt Parcel of DSR-023 and rejected as not deliverable because landowner unknown, but this was untrue
- SR-0067i and SR-0120 do not state that this would be against the Green Belt criteria to prevent settlements merging. Shelley and Chipping Ongar are two distinct settlements as shown in their history.

This list is not exhaustive but indicative of a fundamental problem with the selection site results.

- 3.5 There have been so many stages of assessment with criteria that is either subjective or changes made to criteria during the process. This has made it extremely difficult to follow the justification or otherwise for the eventual site.
- 3.6 Furthermore EB805 has inconsistencies in the treatment of Score and Qualitative Assessment. On some sites it is clear that discussions and further assessment had taken place to see if the negative aspect could be overcome or mitigated against, but in others there was no comment at all. Treatment relating to Heritage Assets and their Settings is not consistent, neither is identification of public open spaces etc. leading to inconsistent scoring, and made by people who do not really have local knowledge. Clearly these subjective scorings have been carried out by a number of different people with no obvious 'moderation' to produce consistency.
- 3.7 The fact that there are 9 sites for Ongar and most come from category 5 or 6 as far as suitability goes (EB805), is not helped by the errors not being corrected.

## **Issue 1      Question 3**

- 4.1 Although it is understood why the Ongar Leisure Centre was removed from the allocation in Regulation 19 Submission Version, the choice of additional sites in Marden Ash was not made public. Development to the southern part of Ongar was originally not preferred due to the housing being too far away from the town centre and primary school to be able to walk, whilst other sites were more central. The sprawl to the south was also deemed harmful to the Green Belt. There was no dialogue between the Town Council, affected residents and EFDC so it came as a complete surprise.

## **Issue 1      Question 6**

- 5.1 Car park spaces at stations affect all commuters in EFDC and neighbouring districts. Existing Ongar residents who commute have to park at Epping or other stations before 7am in order to find a car park space now. A large % of the more recent residents of working age and living in Ongar travel to London. The demand will increase with the additional new homes in the district

and Harlow area. We therefore need MORE car parking spaces in order to encourage people not to use their cars for their entire journey to work.

## Summary

6.1 Ongar is not self-sufficient for a number of reasons including :

- many of its existing working population commute outside the area
- the trend is for London workers to live outside the capital in less expensive locations there is insufficient local employment for new residents
- there is Poor public transport
- Chipping Ongar's retail offering is limited due to the small units and Chipping Ongar having been unable to find a 'niche' specialism in retail
- Until 4 years ago it did not have a secondary school

6.2 Added problems in Ongar of local and through traffic due to

- the necessary reliance on cars for Ongar residents to commute to work
- no rail link to London

6.3 More housing will not make Ongar a sustainable town, regardless of the number of new houses allocated. This is due to lack of employment, education facilities and leisure amenities to sustain a larger population i.e.:

- Larger numbers will not make local retail shopping more likely (see Timpson Report 2018). Internet shopping has changed habits. Provision of additional services and community amenities in the centre is required instead.
- School places including pre school will not be forthcoming at the right time due to lack of initial funding for new classrooms, buildings etc. and is of great concern
- More Leisure and Sports and other community amenities and open spaces are needed for cohesive and healthy communities. There is no indication how or when this will be funded and delivered or how the existing deficit will be addressed.

6.4 Suitability of sites for development around Ongar in EB805 p33 /4 Table 2.7: Summary of site ranking by settlement clearly shows that to be able to reach and justify the 590 number that EFDC decided on for Ongar, they are looking at sites that fall under category 5,6,7 despite those Sites being 'ranked below the 'cut off' in the Land Preference Hierarchy – i.e. no sites proceeding for further testing.

6.5 This presumably accounts for the changes of criteria for Ongar to make the criteria fit the numbers EFDC needed to be allocated here. Hence development in the south of Chipping Ongar at Marden Ash is now a preferred direction. Marden Ash has no shops or schools. The sites are too far to walk into the centre i.e. Chipping Ongar for community activities, convenience shopping and schools. This exaggeration of a recent linear sprawl moves away from a nucleated original medieval and post medieval circular town plan. No linking shortcuts of footpaths and cycle tracks will be possible from some sites allocated in the local Plan.

**ONPCG**

**Ongar Neighbourhood Plan  
Community Group**

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

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