

INSPECTOR'S MATTERS, ISSUES & QUESTIONS

P4 Ongar Hearing Statement Appendix 1

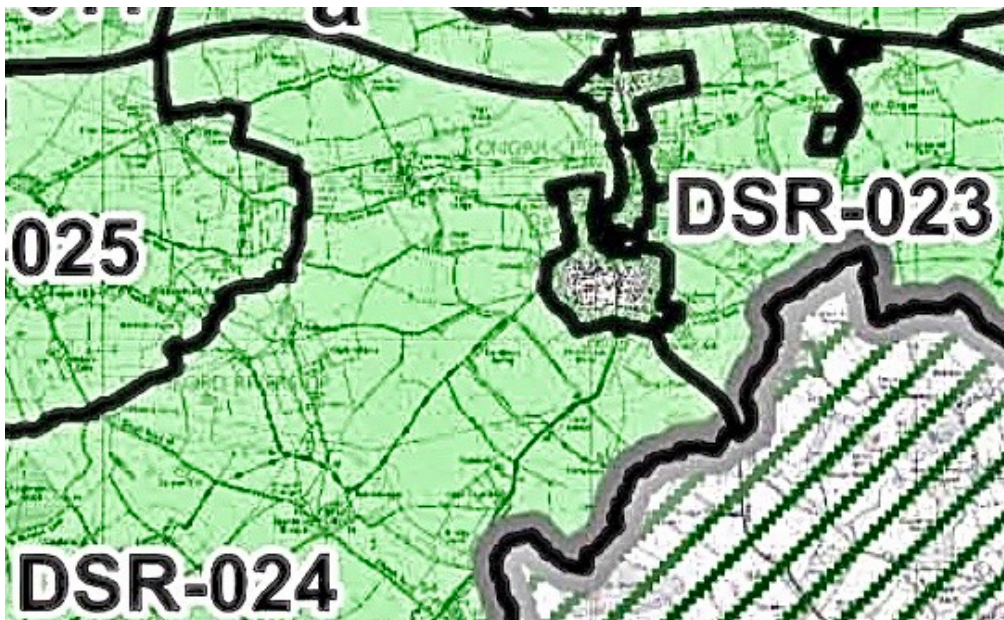
Response from Jim Padfield.

Appendix I Green Belt from Week One Hearing Statement.

The proposed changes to the Green Belt Boundary were never assessed on a site by site basis. Rather the Review assessed only wider parcels, which covered multiple sites, each with their differing qualities and issues. It was always inevitable that individual sites will have different impacts on the Green Belt purposes from those of the parcel as a whole of which they are but one part.

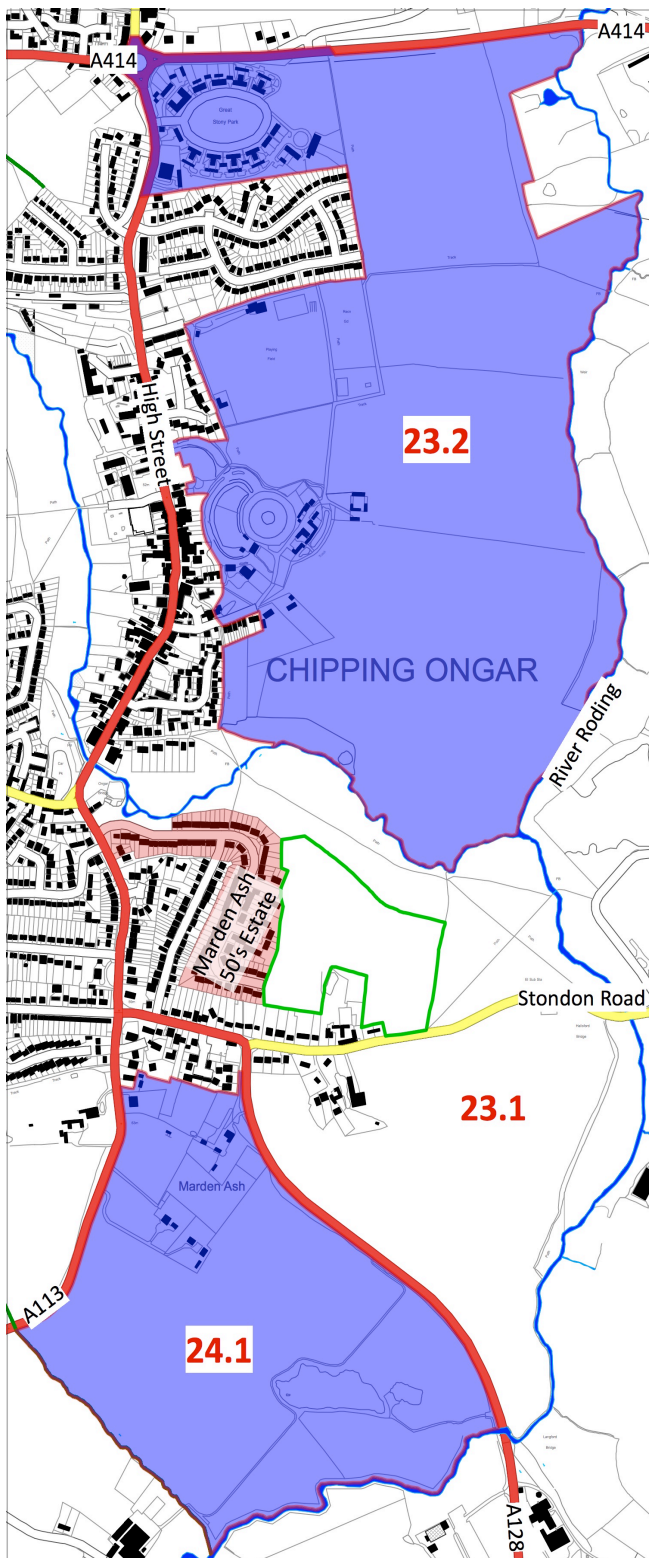
The stage 2 Green Belt Review was never error checked even when errors were repeatedly pointed out - as was the case with Omission site SR-0090 and many other sites. The lack of any corrections to this document is in itself an example of the lack of a robust approach.

In September 2015, EFDC published their draft Green Belt Review Stage 1. It was a strategic review, covering the entire district, which was broken into 61 large land parcels. The relevant ones around Ongar are: DSR-023 – East of Chipping Ongar and DSR-024 – West and South West of Chipping Ongar. The relevant extract from the stage 1 review is reproduced immediately below.



Moving on to the Stage 2 Review, the parcels DSR-23 and DSR-24 are broken down into sub-parcels. For instance, DSR-24.1, 24.2, 24.3 etc. However as far as we can see, uniquely in the whole Green Belt Review report, the sub parcels within DSR-23 are not numbered from .1, but begin at .2 – ie they are numbered 23.2, 23.3, 23.4. There is no designated 023.1 parcel.

For those not familiar with Ongar attached below is explanatory plan. The two parcels 23.2 and 24.1 assessed in the Stage 2 Green Belt Review are identified in blue, with the verbatim Green Belt description of those parcels taken from the study, adjoining. Parcel 023.1 is not described in the Stage 2 Review and so a relevant quote is taken from the Stage 1 Review.



Parcel 23.2

“River Roding forms relatively strong boundaries to the south and east; A414 forms strong boundary to the north. Potential anomalies: None identified.” “The parcel is predominantly rural and free from development with the exception of the residential development at Great Stony Park in the north west of the parcel. The remainder of the parcel consists of open arable fields, allotments on the settlement edge, Chipping Ongar playground and recreation ground, and some individual detached properties with gardens. The Three Forests Way and St Peter's Way public rights of way cross through the parcel and Ongar Castle Scheduled Monument lies in the west of the parcel. The sloping valley sides and consequent visual connectivity with the wider countryside to the east present a strong rural character. ”

Parcel 023.1

Not assessed in the Stage 2 Green Belt Review. Stage I Review states: *“It is unlikely that the loss of openness from urbanising Green Belt land south of Stondon Road and east of the Marden Ash Estate would cause harm to the setting of the historic town and heritage assets, as the 1950's development provides a strong physical barrier. ”*

Parcel 024.1

“A113 forms strong boundary to the west; River Roding forms relatively strong boundary to the south; A128 forms strong boundary to the east. Potential anomalies: None identified. The parcel contains little development with the exception of some detached dwellings (primarily converted farms and barns) and back gardens in the north of the parcel adjacent to the southern settlement edge of Chipping Ongar and buildings at Gray's Farm in the west of the parcel. The outer parcel boundary is strongly defined by a stream and the River Roding along the south western and south eastern parcel boundaries.

In our view, it is obvious when reading the physical descriptions of the parcels in the report (as reproduced above), there is a missing parcel within the Stage 2 Review, comprising land between the A128 to the south/south west and the River Roding to the north. This missing parcel includes omission site SR-0090, shown outlined in green on the above plan.

Rather than correct the error of the complete omission in the Green Belt assessment of parcel 23.1, the Council erroneously assessed SR-0090 as if it were part of 023.2 in the 2016 and 2018 Site Selection Reports, asserting that therefore the parcel had unacceptable green belt impacts and should be rejected from the site selection process.

As a result, this error has had a direct impact on the outcome of the site selection process and therefore the conclusion that the Plan is justified (i.e. the 'most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence') is in doubt.

Whilst Green Belt is only one factor to be weighed in the balance, Local Authorities must, in establishing exceptional circumstances, ensure they choose the least damaging Green Belt options. Clearly without doubt this requirement is not satisfied.

We consider that if missing parcel 023.1 had been assessed in the Stage 2 Green Belt Review it would have been established that (in line with the findings of the Stage 1 review as quoted above) development in this location would not have been prohibitive to site SR-0090 being retained in the site selection process and being considered to be an appropriate location for development.

In the Nathaniel Litchfield's 2016 *"Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period."* SR-0090 was assessed with a better score than four of Ongar's Allocated sites. SR-0090 is a 'reasonable alternative' that has not been properly assessed.

This is just one of many examples of errors and omissions in the foundation work in this Plan. As such, it is not possible to conclude that the Green Belt Assessment process is robust, and the relative importance of the Green Belt around Ongar has not been correctly assessed through the Site Selection process.