

Dear Ms Phillips

EXAMINATION OF THE EPPING FOREST DISTRICT LOCAL
PLAN, 2011-33.

Response to Inspectors letter relating to
OFFICE FOR NATIONAL STATISTICS: 2018-BASED
HOUSEHOLD PROJECTIONS

On behalf of the Marden Ash Action Group, thank you for giving us the opportunity to submit comments to EFDC 's letter relating to the ONS reduced population growth predictions of 2018, and whether there is a need to change the proposed Metropolitan Green Belt boundaries (MGB)in EFDC.

Whilst it is accepted that with over 92% of the district in the (MGB), boundary changes will need to be made to accommodate new homes to meet future housing needs. However, In line with government guidelines, the release of green belt should be kept to a minimum enabling more MGB to be retained.

Previous submissions to EFDC from MAAG, made on our behalf by Martin Edwards QC, clearly state and evidence that EFDC have already ignored these guidelines and established procedures, including submitting incorrectly determined site data whilst ignoring the consultation process.

EFDC are continuing to ignore the established protocols by not modifying the proposed green belt allocations based on latest ONS data.

This is especially the case in locations with insufficient access to employment or public transport commuter links such as in Ongar civil parish, and specifically the 2 sites in Marden Ash (ONGR.6 and 7) which are the furthest points south of Ongar town centre.

Fundamental requirements set out in the government guidelines have been completely ignored with regard to these 2 allocations.

1. There is only 1 hourly bus service (within walking distance) which passes ONGR7 (between Ongar and Brentwood) but this bus route does not connect to any other public transport commuter links (ie underground or railway stations)
2. There is NO bus service, or any other form of public transport within walking distance of ONGR6
3. Any suggestion that the Epping /Ongar railway could ever be reopened as a public commuter service have been completely rejected by its owners and TFL.
4. There are no schools (primary or secondary); health services; shops or any other services within 1000 mtrs (or more) of Marden Ash and Chipping Ongar.

Furthermore the Chipping Ongar (primary) and Ongar Academy (secondary) schools are already considerably over subscribed.

5. There is currently no access to either of these 2 sites, and to create such would result in considerable infrastructure requirements, which the current width and road capabilities and restrictions could not possibly accommodate.

6. Employment opportunities are already severely limited in Ongar, especially in light of COVID-19. Many high street/local shops and businesses have closed, some of them we suspect permanently. There are no employment options within walking distance of Marden Ash.

7. The development of these 2 small parcels of green belt land would result in the removal of a significant mature woodland comprising of over 200 trees, and a natural pond, which is fed by a number of underground springs - all of which provides a natural habitat for indigenous species. This is completely in opposition to the latest government protocols in relation to carbon neutral climate change directives .

8. ONGR6 is in very close proximity to 3 historical listed properties. Marden Ash House (grade II*) Dyers (grade II) and The Old Cottage (grade II).

In response to the inspectors question
ED88 of 15/5/19 (Matter 15 homework)
<https://www.efdclocalplan.org/wp-content/uploads/2019/06/ED88-HW27-Heritage-considerations-CHIG.R7-and-ONG.R6.pdf>

EFDC stated that 'any impact (*to these properties*) can be appropriately mitigated'. This is completely unrealistic given the proximity of this site to these historical properties. Less than 15 meters in the case of 'Dyers'.

This is due to the fact that the site assessment report referred to in point 5 at stage 3/6.3 (capacity) was incorrect and flawed. This assessment indicated 'capacity to build 129 homes' on ONGR6.

However the 'assessment' incorporated land of a much larger area, which is actually part of other properties ie Littlebury Farm, The White House and Grays Farm - none of which is available or ever intended for inclusion - and NOT the much smaller parcel of land actually allocated for ONGR6.

This is extremely misleading and it remains to be seen how this development can possibly be achieved without undermining the historical importance of these properties.

9.. There has been no in depth assessment of this land, which sits down stream between the River Roding and Cripsy Brook, in a natural flood plain, and is therefore susceptible to flooding. This does not meet the criteria for sustainable green belt development.

In addition, available brownfield sites in Ongar have been underestimated and some 400 new dwellings (100 or so in the last 3 years) have continued to come forward in small developments, including on previous employment sites and commercial premises.

ONGR6/7 sites were never included in any previous iterations of local plans, and were rejected by ARUP as 'unsuitable' and discounted by EFDC prior to the September 2016 provisional plan presentation.

This is evidenced in our previous submission [19LTERES0009_8_14](#) dated April 23rd 2019.

These 2 sites were only included - at the last minute and without consultation - immediately prior to the final presentation of the 2016 plan to 'make up the numbers' when a previously selected site - in walking distance of Ongar town centre - was withdrawn.

Now that future housing projections have been significantly downgraded in accordance with the latest ONS statistics, EFDC should urgently review the Green Belt sites which are clearly unsuitable for development.

Accordingly, ONGR.6/7 should remain in Green Belt and be removed from the EFDC Local Plan.

Yours sincerely
Lynn Webb on behalf of the
Marden Ash Action Group

