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4th November 2020

Response to 2018-based household projections, (OAN), and Green Belt release in EFDC

Dear Ms Phillips

Lower growth predictions for EFDC (ONS 2018 **and** Housing algorithm 2020), enables withdrawal of its disastrous proposed GB boundary alterations¹ for the rural civil parish(cp) of Ongar which includes historic Chipping Ongar. Jessel Green (open space) and large part of South Epping has already been removed. Other rural areas like Theydon Bois, despite being on the Central Line, has little proposed development at all.

This ensures EFDC Local Plan also complies with recent government proposals for planning system changes, including LPAs designating **no development areas** for GB and SSSI (Planning for the Future 2020). NPPF is emphatic on only building in **sustainable locations**. Ongar is not a sustainable location.

Failing to withdraw the GB boundary alterations round Ongar will result in permanent harm to the character of Chipping Ongar in particular, and its surrounding rural settlements.

- Chipping Ongar and the cp of Ongar has:
 - little employment nearby- many employment sites already redeveloping as housing since 2000
 - poor and economically unviable Public Transport
 - no rail link to London (50+% of EFDC work in London) and historic EOR is economically unviable as commuter line
 - oversubscribed secondary school places and insufficient pre-school places

The population drop of Ongar cp 1991-2001 is attributed to Central Line Ongar to Epping closure. The remaining population relies on private cars.

¹ Map 2.5 GB Boundary Alterations p 50 EFDC Local Plan

Furthermore, EFDC sites in GB at edges of Ongar cp's built environment are proving to be detrimental to the local character because:

- Proposed higher densities are atypical of the rural neighbourhood: over 40dph for 400 homes and approx. 35dph for 140 more **have been decided by EFDC**. Average local density=24dph.
- ONG-R3&ONG-5- approved by the Quality Review Panel (without ONPCG input) have
 - insufficient car-park spaces, less than 2 per home, despite residents' reliance on cars for commuting²
 - a skew to starter homes/flats, despite a different existing housing mix and need³ being family homes
 - only small outside space, despite Estate agents and national surveys indicating demand for good-sized gardens in rural areas.

At present, Ongar cp is a stable community with schools and recreational facilities. Since 2011, 400 new homes are already built or have applications approved on brownfield sites (details available), 100+ in the last 3 years, exceeding 'windfall' estimates. Many were previous employment sites. 590 more are proposed in the local Plan, by 2026. This is over 30% increase in cp Ongar's total housing in 15 years, thus detrimental for integration into the established cohesive community.

Proposed cramped housing is out of character and will result in more on-street parking. It will also exacerbate the acknowledged deficit in local Open Space, parks and sports facilities, which has insufficient funding to be delivered.

Demand since Covid-19 now includes home-working space and good-sized gardens in rural locations like Ongar.

New residents will need to travel (by car) to work, but without ties to Ongar, insufficient local amenities or school places, worryingly, will turn cp Ongar into a dormitory area.

In addition to your concerns about West Ongar Concept's access, and pollution⁴ from the A414, **new evidence** against the development of ONG-R2 Bowes Field is in EFDC's own Reports and Policies

² ONS figures- Ongar's average household has 2+ vehicles, as does ONPCG Residents Survey

³ ONPCG Residents Survey 2018 results gave flats the least support, with over 80% favouring 3 bed homes

⁴ 2018 annual mean nitrogen dioxide in Chipping Ongar High Street was 38ug/m3. (source EFDC)

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- EFDC identifies Bowes Field as “**semi natural open space with public access**” Open Space Audit 2009, 703 Open Space Strategy 2017 including in calculating Ongar cp’s (deficit of) Open Space⁵.
- DM6 Designated and Undesignated Open Spaces Policy partB would not allow this development

More pollution is expected from North Weald airfield’s use as a Customs Facility⁶ because traffic/HGVs going to/from east coast ports will travel on the A414 to Chelmsford. Increased A414 traffic including ‘idling’ approaching the 4 Wantz roundabout will cause:

- increased pollution affecting ONG-R1/R2 residents
- increased access concerns to/from ONG-R1/R2, via A414 or Chipping Ongar High St

Site selection mistakes by EFDC relating to assessing Green Belt MUST be corrected.

EFDC External reports incorrectly consider Ongar cp as one settlement instead of the historic town and parish of Chipping Ongar, neighbouring rural parishes of Greensted and Shelley, and part of Marden Ash. ONS and other official documents cite Shelley and Chipping Ongar as distinct settlements, e.g. (previous) Ongar Rural District Council, Domesday Book.

EFDC shows a lack of knowledge about its own area. Despite 2 parades of shops, and a deprived community, Shelley is omitted from EFDC Settlement Hierarchy Paper 2015.

80% residents in ONPCG Residents Survey 2018 want open countryside between Chipping Ongar and Shelley to remain.

Green Belt analysis MUST be corrected with Shelley and Chipping Ongar as two different settlements

- Green Belt criteria 2 analysis should be applied to prevent Shelley and Chipping Ongar merging,
- EFDC site selection-GB overall rating gave High Overall Harm for ONGR1/R2 (EB704A, EB705A, EB801GxII, EB8011)

⁵ Map EB706, however, incorrectly locates Bowes Field as SO2 despite local knowledge and Tithe map verification

⁶ <https://www.eppingforestdc.gov.uk/public-engagement-for-hmrc-north-weald-customs-facility/>

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In conclusion, building on Green Belt in the civil parish of Ongar should be omitted from the Local Plan, but particularly ONG-R1/R2, which now has additional concerns. There is no justification for building on Ongar GB when accurately applying GB criteria and particularly when applying:

- **Downward revisions of predicted housing need (ONS 2018 and Housing algorithm 2020)**

or

- imminent planning system changes relating to sustainable development in-Planning for the Future 2020, National Design Guide 2019, NPPF2019, Building for Beauty Report 2020
- demographic changes likely to follow covid-19 pandemic

Yours sincerely

Mary Dadd

Chairman

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