

Epping Forest District Council Representations to the Draft Local Plan Consultation 2016 (Regulation 18)

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Method	Email			
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Letter or Email Response:

...redacted... EPPING FOREST DISTRICT COUNCIL DRAFT LOCAL PLAN CONULTATION 2016 Response by **...redacted...** 1. Basis of response I am submitting this in addition to my questionnaire response submitted earlier. It reflects participation in local discussions and meetings concerning the plans for the Ongar wards. Being aware of representations made by Ongar Town Council and jointly by the Ongar and Shelley District Councillors, I am not seeking to repeat matters that have been raised in detail elsewhere. 2. Ongar's situation at present Chipping Ongar as an historic market town is already under pressure from traffic and transportation problems that it is ill-equipped to cope with. Trade in the High Street and social amenity are facing difficulties that will be exacerbated if development is carried out in a way that will place further strain on the centre of the town. 3. Competing Green space factors Much has been made of the need to protect the Green Belt, but in producing the plan those responsible have seemingly assumed that urban green spaces are of limited value. This is not the case as closely packed housing causes urban stress and needs to be alleviated by the provision of sufficient amenity space and play space. I do not undervalue the Metropolitan Green Belt but fear any approach that regards it is sacrosanct to the detriment of well planned and sustainable housing at appropriate densities. The Green belt is enjoyed and valued by most people on an intermittent basis- the surrounding of their homes is a constant for them. 4. Infrastructure Issues Many representations have been made to **...redacted...** concerning the lack of clear infrastructure planning in the Draft Local Plan. I recognise these concerns and feel it will be important for local communities and Town/Parish councils to be kept abreast of the continuing work that is being undertaken before the Local Plan is submitted. It also seems right that the Local Plan should be very clear about the need for all appropriate infrastructure to be provided or conditioned before full planning permission is granted. 5. Out of ward issue affecting wider community I am not commenting in detail concerning development proposals **...redacted...**, but there is general concern across Ongar about the proposed replacement and relocation of the Leisure Centre. I share this concern and feel that the present site is appropriate as it is in close proximity to the Ongar Academy and other community facilities including the Youth and Adult Education Centre. These form an appropriate hub supported by the Ongar Medical/Health Centre opposite. The proposal for the Leisure Centre site is for 24 homes (SR 0848) and represents a very small gain against the loss of a valued community asset. This amount of housing could be provided by limited intrusion into the Green Belt where it adjoins existing or approved development and has limited value. 6. Proposed sites adjacent to and including Bowes field Bowes Field was an important local open space until the application by Ongar Town Council to have it recognised as community land was lost. This has no direct bearing on the inclusion of (SR0120) in the local plan, but does speak to the need for development at what is effect the gateway to the historic town centre to be dealt with sympathetically. Good design, appropriate density and the provision of adequate amenity and play space should be mandated for this area in the

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Local plan. Some of these considerations apply to the adjacent area (SR0067i) and I think the Town Council are right to consider these two sites jointly. Given the acknowledgment of some over-provisioning of sites at this stage of the process, careful consideration should be given to achieving less density (and thereby more openness) for sites of strategic importance - such as those visible at the entrance to settlements or contributing to historic street scenes. If reduction in density cannot be achieved by rebalancing development within already assessed areas, then further development to the South East of SR 0067i/0120 should be considered as this would do little harm to the Green Belt especially insofar as there is already considerable build along one side the A 414 and the once significant view of the centre of Chipping Ongar is already obscured the Great Lawn/Bowes Estate development. 7. Proposal affecting the "Stag" public house The proposal for 10 homes adjacent to the Stag Public House has met with considerable opposition. I agree that the limited gain in housing numbers does not justify the inevitable reduction in viability of an established and well supported community asset. 8. Proposed development at Greenstead Road ...redacted... representations about the proposed development at Greenstead Road (SR 0390) especially concerning the density of the proposed development and the serious infrastructure deficiencies already affecting the adjacent residential area. I have also been told that not all the land concerned is in the ownership of the person/body who submitted the area at the Call for Sites stage. This is a very important consideration which could affect the viability or number of homes to be delivered at this location, and by implication have a direct effect on the other areas originally assessed for Ongar. 9. Quota of development allocated to Ongar I support the community view that "Ongar has to take its fair share of the housing needed". This does not mean that an area of significant strategic and historic importance, already subjected to significant infrastructure deficit and challenge, should be expected to absorb inappropriate high density development. The need for small family and single person accommodation should be given priority over larger multi bedroomed properties that are frequently under-occupied. Adequate green space and definite guidelines about spatial design are needed. 10. Sustainability There is some concern about the sustainability approach taken for the area of Chipping Ongar, Shelley, Greenstead and Marden Ash. This leads to some inconsistencies with the methodology adopted elsewhere and I think it is important to understand that these are distinct areas - not just settlements divided by Green Belt land. I understand that the Town Council has an intention to produce a neighbourhood plan and if/when this is developed there should be an indication of the preferred approach to sustainability in these discrete areas, especially where they are some distance from the facilities of the Chipping Ongar town centre. 11. Local versus district concerns I recognise that a Local Plan should represent the needs of the district as an entirety, but this does not mean that a "one size fits all" approach to policy constraints is acceptable. Few would dissent from the concept that Waltham Abbey has different needs to a smaller historic town, but there are also significant differences between the other larger areas of population that are near each other and have associations with Ongar, Greenstead and Marden Ash. Not only aspirations, but also Green Belt and other factors vary widely between Ongar and its neighbouring settlements of North Weald and Epping. Ongar needs coherent planning policies for the future that will preserve and expand its role as a well-planned and attractive community with both good resources and a distinct heritage. 12. Proximity to Brentwood The Ongar Wards are at the edge of the EFDC area and abut the Brentwood Borough Council area. It is a matter of concern that there has been little indication of close working with this neighbouring authority, although I do accept that more work may have been undertaken than is apparent from easily accessible records. It seems to me to be unfortunate that the Draft Local Plan was submitted for consultation before the memorandum of understanding between the SHMA authorities had been finalised and signed off. I understand the pressures on EFDC to progress its Local Plan, but nevertheless the absence of final agreement with our neighbours remains a significant omission as may be illustrated by this extract from the Brentwood Council response to the EFDC draft local plan: "4.13. However, the SHMA area local authorities consider that with constraints, the 2016 maximum amount of growth for the plan period is "around" 51,100. Therefore, it is considered appropriate that Brentwood Borough Council expresses concern that Epping Forest District Council has not formally finalised the Memorandum of Understanding with the other partners of their housing market area for the exact allocation of the considered maximum growth of 51,100, or agreed to meet the identified objectively assessed housing need of 54,600" And also "5.1. It is not considered necessary to object to the Epping Forest District Draft Local Plan consultation on the basis of likely minimal impacts for Brentwood Borough. However, the four districts (Epping Forest, East Herts, Harlow and Uttlesford) within this housing market area have not finalised their agreement for meeting local housing need the target, with a Memorandum of Understanding still in draft form. There is a risk of a greater number of homes being required within Epping Forest District. Brentwood Borough Council should therefore take a precautionary approach under the duty to cooperate." Section 5.2. in the same document reads: "Specific mention is made to the way in which development is planned around Chipping Ongar and

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High Ongar, so as to minimise potential impacts on the north of Brentwood Borough and to ensure the benefits of new development are shared across the wider area and local communities.” Whilst understanding the need for co-operation, I do not think that the constraint alluded to in 5.2 above has ever been properly acknowledged in consultations with the Ongar community or it’s representative Town Council. ...redacted... apparent disparity between the information provided about negotiations/agreements reached with Brentwood, as distinct from the other SHMA partners. 13. Unacknowledged development proposals I need to draw attention to what I regard as probably the most serious issue raised by the consultation. This concerns land to the east of Chipping Ongar. Independently two major landowners have informed ...redacted... that they submitted proposals for significant areas of land which have been acknowledged, but not included in the Draft Plan, or as far as I am aware in any of the consultations or meetings provided for Ongar people or their representatives. One of these proposals could provide a means of securing the planning advantage referred to in the draft plan (P245, Section 5.71) of “promoting local heritage assets including Ongar Castle and the High Street Conservation Area whilst protecting the historic character of the town”. At the moment, Ongar Castle is in private ownership and largely unnoticed by visitors. This is likely to remain the situation unless some means of ensuring public access and the development of the site as a heritage benefit can be found. If the castle became a properly promoted heritage site the “knock on” benefit to the High Street area could be considerable. I make no comment on the viability or appropriateness of these proposals for land to the east of Ongar, but believe it is entirely wrong for them to be excluded from the public debate and consultation about the future development for Chipping Ongar Greenstead and Marden Ash. The availability of sites with significant development potential must surely be properly addressed at some stage. It is simply unacceptable that the community has been asked to consider the viability of other, smaller land holdings while not being made aware of two very significant proposals which might have the capacity for appropriate development and the provision of much needed infrastructure improvement. 14. Limit of response & conclusion I have not commented on other matters including Education, Health and Transport or environmental issues as I believe the concerns about these have been well aired by others during the consultation period. I have also limited this response to matters concerning ...redacted... . The basic thrust of the NPPF is three-fold, and requires the three elements to be balanced. I do not believe that the present proposals for Ongar have taken the needs of the community as a starting point, but have sought to distribute new housing arbitrarily to meet pre-determined needs for housing across the SHMA area. While it is right that housing need is met, the sites selection process began with a call for sites, rather than an exercise with the community to scope the social viability and acceptance of future development. However inevitable, this has led to consultation being constrained to specific sites rather than an overall assessment of opportunities for development and improvement presented by the area. Overall, I do not think that the competing issues have been well balanced so as to ensure that the wards of Chipping Ongar, Greenstead and Marden Ash will be best placed to achieve the NPPF goal of a achieving a strong, responsive and competitive economy supported by appropriate housing in a high quality built environment with accessible local services that reflect local need. ...redacted...