

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

Stakeholder ID	3872	Name	Aimi	Middlehurst	Ongar Town Council
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Method	Letter
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Date	5/12/2016
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Letter or Email Response:

...Redacted... Response to Local Plan Opening Statement Ongar is an historic market town with a population of approximately 7,500. It has numerous listed buildings, a conservation area, focusing on part of the High Street and including the castle which is a Scheduled Monument. The shop units are small and the historic nature of the centre limits the potential for change in the High Street. A small but dwindling weekly market is held in one of Ongar's car park areas. The town has two major roads running through it the A128 and A414, which is the busy main route linking Hertfordshire and to the ports of Felixstowe and Harwich. The old Central Line remaining track is now used by the Epping Ongar Railway for as a leisure/tourism line and is not a commuter line. Greensted Church, a Grade 1 listed building, and the Essex Way are nearby and are also tourist attractions. Occasional flooding from the River Reding and Cripsey Brook affects the eastern and western sides of the town. Ongar is surrounded by Green Belt with very little brownfield sites remaining. There has already been a considerable amount of new housing during the last ten years and there is already concern about the primary schools and health facilities nearing capacity Public transport is limited and there is no train station. The narrow High Street causes a bottle neck and there is often traffic congestion even outside peak hours. Introduction ...Redacted... appreciates that new housing is needed to provide homes for the increasing population but ...Redacted... would only support new housing provided it is in a controlled manner that the community and infrastructure can support. Current deficiencies in infrastructure (see below) already affecting the residents of Ongar will only be exacerbated by the substantial growth in population proposed by Epping Forest District Council's draft local plan. ...Redacted... demands that any new housing should be small scale developments. This would be more likely to retain Ongar's existing character, which has grown gradually over a long period of time. The Local Plan essentially proposes 3 large estates in Green Belt. ...Redacted... believes the proposed increase in housing is disproportionate to that in other areas. Ongar would be taking a 28% increase against just over 20% projected for EFDC as a whole (ref. Local Plan Chapter 2 points 2.3 and 2.7). A 28% increase in a place without adequate local employment will necessitate more commuting. The poor public transport links to places of work from Ongar will make it a less desirable place to live for new residents, so the demand is likely be lower than in other areas. Ongar can never be a self-sufficient market town and the proposals are essentially for 3 large estates, which would not retain the character of the historic town A large estate of houses such as is proposed will increase the risk of flooding or a larger flood plain area. The high density of new housing is a concern and will permanently change the balance and mix of socioeconomic groups in Ongar. ...Redacted... is concerned that EFDC's Draft Local Plan lacks Green Belt policies. If Green Belt land is to be released for building, there needs to be clear and transparent policies relating to such things as limited infilling, previously developed land, conversions and similar issues as found in the Brentwood draft Local Plan in addition to the

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NPPF. We believe there should be further definition as to how the Green Belt policy will be applied to new developments to ensure that further 'inappropriate' building within the Green Belt does not happen either now or in the future.

1 Current deficiencies in infrastructure

- Primary schools in Ongar are already full or nearly full. Currently some children living in Marden Ash have to travel to Doddinghurst Primary School as Chipping Ongar School is currently over-subscribed. Some children have to be transported to Moreton School for the same reason.
- The Ongar Academy will not be large enough to provide secondary education for the expected number of pupils, and currently takes pupils from a very wide area, not just Ongar
- Since the closure of the High Street doctor's surgery in August, the Ongar Health Centre in Fyfield Road is already oversubscribed. Patients find it very difficult to get an appointment or to find adequate parking near the surgery. There is no room on the site for the building to be extended to provide further treatment and consultancy rooms.
- With the prospect of St Margaret's Hospital closing and Princess Alexandra Hospital being relocated on the outskirts of Harlow town centre, residents of Ongar without transport will have problems travelling to hospital for appointments and treatment
- With an ever ageing population, more provision for the elderly, such as sheltered housing, care homes and retirement flats, will be necessary and there seems to be no provision for this in the Draft Local Plan
- The restrictions and cuts to emergency services, especially the police, is an increasing concern.
- Road improvements to the A414, A 10, M25 and M11 are all mentioned in the Local Plan. The A128 (Ongar High Street) has no mention yet is in a very poor condition as are the pavements.
- ...Redacted...s cemetery will be at full capacity in approx. 20 - 30 years. After that a new site will need to be found but the Council will still have to maintain the existing cemetery with a much reduced income. There is currently no suitable site within the town. St Peter's church in Shelley has an open burial ground but it is not known for how much longer. There is no other burial ground in the parish of Ongar which means residents will have to travel to other parishes and pay the "out of parish" increased fees. ...Redacted... fees for outside of parish are triple, other parishes can charge up to x10 fees. Other councils who have implemented a new burial ground have said it can take approx. 20 - 25 years from planning to opening. The process can also be costly as potential sites will need to meet certain criteria on environment, soil suitability, height of water table etc. as well as is planning, design and building costs. Utilities There are no guarantees that the various utility companies will upgrade and provide new supplies. Water pressure is often very low in Ongar and there are regular leaks in the current mains water supply. The land drains in the High Street frequently get blocked following heavy rainfall, especially between Tesco Express and Central Electrics, leading to flooding of the pavement and road, making it difficult to walk to the shops, especially for the elderly and less able bodied using mobility scooters or walking aids. It also causes flooding and damp in the basements of nearby properties (Bansons Court.) They require repair or renewal before any further development takes place. Broadband speeds and mobile phone reception are inadequate.

2 Current situation and the effects of proposed new development

Ongar currently has around 21500 homes; the proposed development of over 700 new homes (including the 105 homes on the Fyfield Business Park, already approved by EFDC) and the subsequent influx of new residents will put increased pressure on the existing infrastructure and the community. Existing problems relating to heavy traffic, inadequate parking spaces, healthcare, school places, public transport, and local services will only get worse and there is no provision in the plan to accommodate an increase in population.

Commuting - public transport and car use

Ongar is a commuter town and cannot support employment for the working population therefore many residents need to travel to work. The local bus service is unreliable and has limited destinations and therefore residents need a vehicle to get to their place of work. Many people commute to Brentwood, Harlow, Chelmsford and other local centres as well as by tube to London and various points on the tube network. Epping Forest District Council's vision for Ongar to support non-car based modes of travel is not realistic. For those commuting by tube, the only reliable way to get to Epping station is by car. It has been stated that there will be no loss of parking spaces at local underground stations if car parks are developed. With the increase in the population of the district, commuter parking would be expected to increase putting additional pressure on parking at all stations. Neither is there a solution suggested to solve the problem of commuter parking while these sites are under construction. Additionally, trains from Epping and beyond are already full to capacity. TFL cannot increase capacity on the Central Line due to the following:-

- The dimensions of the tunnels prevents an increase in carriage size
- Platform length in Central London prevents the number of carriages being increased
- The signalling system prevents the provision of more frequent trains
- Passengers travel to Epping from further afield to use the tube rather than the more expensive mainline trains
- Development in other areas will increase the demand on the underground service

Ongar is a rural community and does not enjoy the same level of public transport, or the variety of shops and facilities, enjoyed in the more urban parts of the Epping Forest District Council's area and therefore cannot fully support the needs of the residents. Ongar cannot rely on the present public transport

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infrastructure, with its limited service and destinations, to accommodate the needs of the residents. We live in a mobile age with a diverse culture and choice cannot be restricted to public transport for residents to visit larger shopping centres, to socialise with family and friends, to attend community sports facilities and visit other areas for leisure or work. Additionally, due to the rural nature of Ongar and the surrounding narrow country roads which provide access to the town, agricultural vehicles commonly cause delay and congestion. An increase in population will exacerbate this problem. New residents and their family and friends may not necessarily be from the local area - this will lead to a further increase in road usage. Again Epping Forest District Council's vision for Ongar to support non-car based modes of travel is not realistic. Air pollution Current air pollution in Ongar is in excess of EU regulation. Pollution will rise with the inevitable increase in the number of vehicles using local roads. Noise, vibration and air pollution is intensified in Ongar's historic high street due its narrow and restrictive nature. This has an impact on residents living in the High Street, pedestrians and shoppers and also has the potential to further damage Ongar's historic buildings in this conservation area. 3 Car parking provision No provision has been made to cater for additional car parking in Ongar High Street to deal with the significant increase in vehicles from new residential developments, and to cater for the "vibrant centre" proposed by Epping Forest District Council. Currently residential side roads are already used as free parking and residents already suffer because of this. Additional car parking is essential and car parking charges should be reviewed, reduced or free parking periods should be provided to ease the parking situation and attract more trade to the local retailers, who are the life blood of the High Street, and to entice more businesses to locate here. Adequate car parking must be provided in any new development. Traffic Congestion Ongar already has a problem with the high volume of non-local traffic passing through it to access either the M11 or M25 and other major routes. Essex County Council recognises that the current flow of traffic on the -M11 is not fit for purpose and has, for some time, been lobbying Central Government to improve the traffic management. An increase in local population will intensify this issue. When the M11 or M25 are congested or blocked the A 128, A414 and A113 are used by motorists, including heavy goods vehicles, to avoid the motorways, causing severe congestion in Ongar High Street and surrounding routes. Major traffic tailbacks in the High Street, caused by heavy goods vehicles loading and unloading and illegally parked cars, occur at any time, particularly at peak periods. Traffic queues extend along the High Street to the Four Wantz roundabout and onto the A414 from either Chelmsford or Harlow and in the other direction along the A128 and A113 from Brentwood and Romford. The two access points to Ongar - Four Wantz roundabout and Coopers Hill - are already congested during rush hour periods. The provision of a bypass would help to ease this problem. Traffic management plans for all the proposed development should be made available for consultation prior to the Local Plan being adopted. Infrastructure The Local Plan appears to have a vague approach with regard to infrastructure with little recognition of problems that residents currently face or the detrimental affect any additional development will present. Infrastructure improvements appear to be totally reliant on other agencies over which Epping Forest District Council has no direct control or authority. It seems unlikely that S106 agreements on individual sites will provide enough funding to accommodate the necessary improvements to the infrastructure for both existing and new residents.Redacted.... opposes further urban intensification unless adequate infrastructure is identified, discussed and agreed, alongside timescales for its implementation, to help minimise any negative impact on our residents Comments re specific sites SR 0102 - Land rear of 57a and 57b Fyfield Road - Approx. 16 homes - Suggested alternative useRedacted.... strongly recommends that part of this site should be considered for additional parking for the Ongar Health Centre, which currently has very limited parking and has also recently increased its patient number due to the closure of the practice in the High Street. The limited parking will be greatly exacerbated with the significant increase in the population of Ongar. The limited additional parking currently available for patients will disappear if SR0848 - Leisure Centre, The Gables is developed. When the Health Centre opened, this area was made available for additional patient parking due to the limited parking provided on the Health Centre site. This site would also be an ideal location for a small number of retirement bungalows. (Illegible) • The local primary schools walk to the Leisure Centre for swimming and other activities. They would need a coach or similar to travel elsewhere and this would be a) expensive, b) take more time, c) use roads which are already busy. Reduced road usage is a key point of the plan. • Ongar Academy is being built without a swimming pool and it will have a sports hall which will have no gym equipment. The pupils will have to rely on the facilities at the Leisure Centre to fulfil their needs for a full and proper education. • Many residents walk to the Leisure centre for their activities, and would not be able to get to another location without a car or decent public transport. Reduced road usage is a key point of the plan. • Road user and pedestrian safety is a prime concern. Traffic on Fyfield Road has already increased traffic due to the Ongar Health Centre and the Ongar Academy. This will escalate once the Fyfield Business Park housing development

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and the proposed use of the remaining land to increase businesses and job opportunities is completed. Development of this site will lead to further traffic in this area. • Points taken from the Draft Plan below include accessibility if facilities need to be relocated- this is a key issue for Ongar residents and schools. Draft Policy D 4 - Community, Leisure and Cultural Facilities 6.32 The Council will safeguard against the unnecessary loss of valued facilities and services. It will also plan positively for the improvement of existing facilities and the provision of new shared spaces and community facilities. The Council will work with partners in the public, private and voluntary sector to achieve this. 6.35 Access to a range of indoor sports and leisure facilities is also vital for healthy communities. The Council will ensure existing facilities are maintained and improved where possible. The Council supports dual use of school sports facilities by the community. 6.37 In some instances, it may be necessary to consolidate or relocate facilities to better serve the growing population and provide more accessible facilities. Where this is appropriate there should be no net loss of community, leisure or cultural facilities. Draft Policy D 4 Community, Leisure and Cultural Facilities D. Proposals that would result in the loss of valued facilities currently or last used for the provision of community, leisure and cultural activities will only be permitted if it is demonstrated that: i) The facility is no longer needed for any of the functions that it can perform; or ii) It is demonstrated that it is no longer practical, desirable or viable to retain them; and iii) Any proposed replacement or improved facilities will be equivalent or better in terms of quality, quantity and accessibility and there will be no overall reduction in the level of facilities in the area in which the existing development is located; or iv) The proposal will clearly provide sufficient community benefit to outweigh the loss of the existing facility, meeting evidence of a local need. s SR0184 - Land adjacent High Ongar Road - Approx.30 homes - Concern SR0185 - Land adjacent High Ongar Road - Approx.124 homes - Concern SR0186 - Land adjacent Chelmsford Road (A414) - Approx.12 homes - Concern These three sites merge into one and will form an estate of 166 homes greatly increasing the number of vehicles accessing the A414 very close to the Four Wantz roundabout. Road user and pedestrian safety is the concern as is the overall size of the development. The Draft Local Plan gives no information as to how the additional traffic will be managed, or any suggested alteration to the road system. Traffic management plans should be made available. SR0067i - Land to the west of Chipping Ongar -Approx. 73 homes - No objection SR0120 - Bowes Field - Approx. 135 homes - should be reduced in scale to run parallel to the A414 away from existing houses These two sites merge into one and will form an estate of 208 homes, greatly increasing the number of vehicles accessing the A414 very close to the Four Wantz roundabout on the opposite side to SR0184 - Land adjacent High Ongar Road,SR0185 - Land adjacent High Ongar Road and SR0186 - Land adjacent Chelmsford Road (A414).Road user and pedestrian safety is the concern.The Draft Local Plan gives no information as to how the additional traffic will be managed, or any suggested alteration to the road system. Traffic management plans should be made available. SR0067i is virtually a brownfield site to which **...Redacted...** has no objection. SR0120 - Bowes Field is Green Belt and supports an abundance of flora and fauna. The residents of Great Lawn and Marks Avenue currently enjoy panoramic views of the local countryside which will be lost to them and will have a detrimental effect on the environment they presently enjoy and have done since the homes were built. **...Redacted...** believes that this development should be removed from the Local Plan or should be reduced in scale to run parallel to the A414 away from existing houses. This would reduce the impact on existing residents and the flora and fauna and provide a buffer zone between existing homes and development on SR0067i- Land to the west of Chipping Ongar. SR0390 - Greensted Road - Approx 175 homes - Concern Due to the very narrow, winding and dangerous nature of Greensted Road at this point, road user and pedestrian safety is the concern particularly access onto the A128 at the Two Brewers junction. The Draft Local Plan gives no information as to how the additional traffic will be managed, or any suggested alteration to the road system. Traffic management plans should be made available. The residents backing onto this site currently enjoy panoramic views of the local countryside which supports an abundance of flora and fauna. This will be lost to them and will have a detrimental effect on the environment they presently enjoy and have done since the homes were built. **...Redacted...** believes that this development should be removed from the Local Plan or that the development size is scaled down to reduce any impact on the residents and the flora and fauna. SR0842 - Car park at the Stag public house - Approx. 10 homes • Strong objection, will make PH unviable The Stag Public House is an old and attractive building located in Marden Ash, out of the town centre. The building of 10 modern homes next to it will spoil the street scene and the historic character of the Public House. Many local residents from the Marden Ash area can (ILLEGIBLE) the pub during the summer months to enjoy the large garden with outside seating and Children's play area. If this site is developed pub customers will have nowhere to park. The Brentwood Road has a dangerous blind bend at this point and the parking of vehicles along the road would increase the risk of an accident. Passing trade will not stop here if there is no car park. If usage of the pub should diminish because of the lack of parking and it becomes

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financially unviable, it may have to close and will be yet another loss to this rural community. It provides a much needed service to the local residents for this part of Ongar. Road user and pedestrian safety is the concern as well as the viability of the pub should it lose its car park. Closing statement [Redacted] is opposed to the scale of the new housing proposed. Additional school places, additional parking, better public transport and a bypass need to be in place at the same time or before any increase in population. [Redacted] reserves the right to oppose or suggest amendments to individual developments. New developments must include 'green walks' and landscaping to mitigate the effect on existing houses. Larger developments should also include sufficient leisure and social facilities for the town. [Redacted] reiterates that new developments should be smaller than the large estates proposed as these would permanently change the character of Ongar. [Redacted] demands for there to be staged alterations to the Green Belt over the period to 2033, including only part of each site at each stage. [Redacted] strongly believes that the historic and rural nature of this town should be protected for future generations to enjoy. Ratified at [Redacted] meeting on 5th December 2016