



**Epping Forest
District Council**
www.eppingforestdc.gov.uk



Representation form for Submission Version of the Epping Forest District Local Plan 2011-2033 (Regulation 19 publication)

This form should be used to make representations on the Submission Version of the Epping Forest District Local Plan which has been published. Please complete and return by 29 January 2018 at 5pm. An electronic version of the form is available at <http://www.efdclocalplan.org/>

Please refer to the guidance notes available before completing this form.

Please return any representations to: Planning Policy, Epping Forest District Council, Civic Offices, 323 High Street, Epping, Essex, CM16 4BZ

Or email them to: LDFconsult@eppingforestdc.gov.uk

BY 5pm on 29 January 2018

This form has two parts – Part

A – Personal Details

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Please attach any documents you wish to submit with your representation

Part A

1. Are you making this representation as? (Please tick as appropriate)

a) Resident or Member of the General Public or

b) Statutory Consultee, Local Authority or Town and Parish
Council or

c) Landowner or

d) Agent

Other organisation (please specify)

CPRE Essex

Tel/Fax:

Email:

December 2017

2. Personal Details

3. Agent's Details (if applicable)

Mrs Patricia Moxey

Vice Chairman, CPRE Essex

Tel/Fax:

Email:

December 2017

Part B – If necessary please complete a separate Part B form for each representation

4. To which part of the Submission Version of the Local Plan does this representation relate? (Please specify where appropriate)

Paragraph Policy Policies Map

Site Reference Settlement

5. Do you consider this part of the Submission Version of the Local Plan:

*Please refer to the Guidance notes for an explanation of terms

a) Is Legally compliant Yes No

b) Sound Yes No

If no, then which of the soundness test(s) does it fail*

Positively prepared Effective

Justified Consistent with national policy

c) Complies with the Yes duty to co-operate No

6. Please give details of why you consider the Submission Version of the Local Plan is not legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance, soundness of the Local Plan or compliance with the duty to co-operate, please also use this box to set out your comments

I am writing on behalf of CPRE Essex to raise concerns about the soundness of the proposed Draft Local Plan respect of the ONG R5

In its Vision for Ongar EFDC sets out the following:

Ongar will continue to thrive as a settlement, and its existing local and independent character will be retained and strengthened. Development in Ongar will contribute towards the settlement's self-sufficiency aspirations, particularly through the provision of additional local services and infrastructure. This will include measures that support alternative, sustainable modes of travel to reduce congestion and reliance on car-based transport mode

The provision of approximately 590 homes has been informed by the aspiration for Ongar to remain self-sustaining, to ensure that sufficient homes are built to support existing services and to maximise the opportunities provided by the new secondary academy and capacity in the two primary schools. Development beyond the current urban footprint of the town is constrained as the town is surrounded Metropolitan Green Belt. While part of the strategic option is sensitive in Green Belt terms the option as a whole is less harmful to the Green Belt relative to the other strategic options identified for this settlement. It is considered that the particular opportunities for sustainably locating development presented by this strategic option would outweigh potential Green Belt and landscape harm, both of which can be limited through incorporation of suitable mitigation. Exactly how can this be achieved?

Whilst the Review of the Green Belt has identified some acceptable areas adjacent to larger settlements where boundary revision provides for the District's projected growth in sustainable locations, CPRE Essex is opposed

to this in principle as CPRE is keen to advocate the development of brownfield sites first and seeks assurance that an adequate survey and register of suitable brownfield sites has been prepared.

ONG R5 is an expansion to the south of the town, with a proposal for approximately 107 dwellings. It is a greater distance from existing town centre amenities and community facilities it is still served by public transport. However, ONG R5 appears to lack any concept of good urban design and place shaping principles and fails the sustainability aspects of the NPPF.

The east west route of the A414 links the M11 at Harlow to Chelmsford and further east towards the east coast ports. The main road through Ongar town links to the M25 which is often used by lorries when the M25/M11 interchange is blocked. Traffic modellers at Essex County Council raised safety concerns about increased traffic movements within the Ongar area and Essex Highways report of 2017 shows the traffic at the 4 Wantz roundabout almost at capacity during peak periods now as is the roundabout at Marden Ash. Turning right onto Coopers Hill is difficult at busy times. With the expected huge growth in economic activity around Harlow due to the London-Stansted-Cambridge corridor, and projected growth in the Brentwood area, traffic through Ongar will increase significantly, with commercial vehicles and private cars with the workers commuting from the local employment hubs. Any entrance to the proposed development will require care as there are a number of bends on the Greensted Road and the entrance to Chipping Ongar School is also located close to a blind bend.

Chipping Ongar Primary School is at capacity at the present time. With the projected increase in dwelling unit additional classrooms will be required with subsequent loss of much valued space around the school.

Although it may be possible to increase the number of employment opportunities within the town, the majority of those occupying any new houses will be commuters travelling to work elsewhere. Public transport or the use of private cars will be the main methods of travel to work. This will increase the volume of traffic on the main routes in and out of the town, adding to congestion and increasing levels of pollution.

Whilst it is appreciated that Ongar residents might be able to capitalise upon its heritage and leisure assets, such as the Epping Ongar Heritage Railway, it is unlikely that any viable commuter link with Epping can be readily established. The station car park has been built on and any commuters from outside the town will not find parking spaces within the town.

It is hard to imagine that the picturesque Essex Way will attract others than exceptionally hardy ramblers to access employment opportunities along its route!

Cycling along the A414 is hazardous and the minor cross-country routes are far from ideal for cyclists riding to work with many bends and steep hills.

It is imperative that the Sports Centre is retained as a valuable part of the local infrastructure. The suggestion providing such facilities either Epping or North Weald would not reduce the number of vehicle movements. With concerns over lack of fitness within the UK population, every opportunity to encourage local use of swimming pools and gyms as well maintain local open spaces and a good network of rural footpaths should be encouraged.

The recent modest increase in dwelling units has placed considerable strain on the current sewage system. The Draft Local Plan is vague about the provision of this vital element of infrastructure.

Ongar does have a new health centre, but the overall provision for hospital care is overstretched especially if patients are referred to Princess Alexandra Hospital in Harlow.

Various organisations objected at Draft Local Plan stage on the grounds of the potential loss of biodiversity on these sites, including several protected species. Their protection has not been mentioned Appendix 6: Site specific requirements for Site Allocation.

Overall the above points make this proposed Draft Local Plan unsound.

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7. Please set out what change(s) you consider necessary to make the Submission Version of the Local Plan legally compliant or sound, having regard to the test you have identified in the question above (Positively prepared/Justified/Effective/Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the Submission Version of the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Aspects are unsustainable and need to be revised.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

(Continue on a separate sheet if necessary)

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the hearings

Yes, I wish to participate at the at the hearings

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9. If you wish to participate at the hearings, please outline why you consider this to be necessary:

To personally clarify the reasons set out above if the Inspector wishes to raise any queries.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

10. Please let us know if you wish to be notified when the Epping Forest District Local Plan is submitted for independent examination (Please tick)

Yes

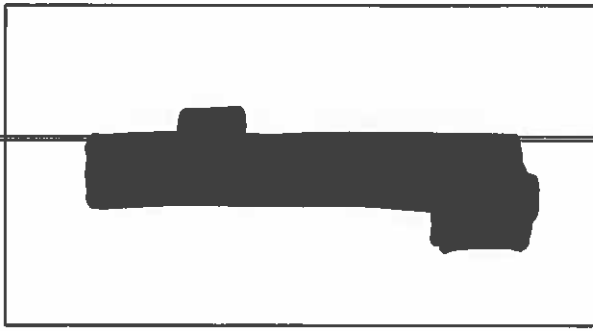
No

11. Have you attached any documents with this representation?

Yes

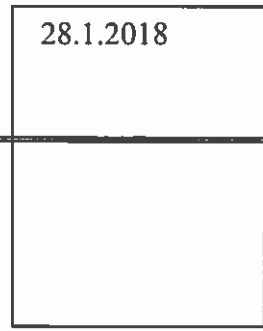
No

Signature:



28.1.2018

Date:



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