

ONPCG**Ongar Neighbourhood Plan
Community Group****ONPCG Representation January 2018 to
EFDC Local Plan 2011-2033 (Regulation 19 publication)****A. Introduction****Ongar Neighbourhood Plan Community Group (ONPCG)**

1. ONPCG was formed in May 2017 and is now "appointed to [Ongar] Town Council [Neighbourhood Plan] Subcommittee" who are "the lead body in developing the Neighbourhood Plan for Ongar¹ "
2. Our 12 strong Committee represent a cross section of the community, including members with background experience in Education, Youth, Disadvantaged, Health and Welfare, Property (including Commercial), Engineering, Structural Engineering, Infrastructure Delivery, Housing and Town Design, Local employment, Town Centre economy, Tourism, Heritage Assets, Natural Environment, Transport and Infrastructure, Leisure and Sports Facilities and Amenities, Pollution, Conservation and the Natural Environment.
3. ONPCG have a growing support for its work in the community of Ongar, including in expressing the concerns of the community² in relation to the intending rapid growth in housing and therefore the rapid growth in population of around 25% in Ongar within a 6 year timeframe from 2020 -2026.

Representation will be relating to Policy P4 and Policy D4 as follows

B. Representation relating to Policy P4 Ongar**The Local Plan's Proposal for Ongar**

4. **Ongar is expecting to have about 25% increase in population from the proposed 590 new houses, within a very short time period of 6 years from 2020-2026. Associated with these households, there will be approximately 1000 more cars in Ongar.**

¹ See Ongar Town Council Minutes for 17th October 2017 item 79/17 Neighbourhood Plan Structure

² See Appendix 1 Existing identified Issues For Ongar being Concerns of Ongar people as collated from community engagement

5. Robust detailed Planning Policies are therefore required to ensure that the individual identity and character of Ongar is retained, in line with NPPF sustainability and Chapter 8 principles for the wellbeing of the community. Ongar has some existing identified inadequacies in provision of Amenities and Facilities³. ONPCG would expect that funding is found to redress these quickly. This should be in addition to the required enhanced infrastructure to support the new development - as detailed in ARUP Infrastructure Delivery Plan and Local Plan Policies D
6. As the following sections and paragraphs highlight, the Local Plan lacks this support. Also, **its lack of general good Urban Design and a Masterplan for the greatly increased population of Ongar within a short period of time, is in danger of destroying the character, atmosphere and cohesive community of the town**
7. Some residents will undoubtedly still prefer there to be no increase in population for Ongar. However, there is a general acceptance that there is nowhere for our children and grandchildren to live in the locality and that it would be good for the Town to encourage young families to move here to enjoy the quality of life that a small rurally located market town can provide.
8. **ONPCG therefore view the agreed increase in housing and therefore population for Ongar, as an opportunity to invigorate the town and to enable it to become more sustainable again, with a cohesive community with a good quality of life.**
9. Accepting that many residents may have to commute to places of work, Ongar should be able to provide for day to day needs including those met in the Town Centre retail, services and eating and drinking establishments; good health and education facilities in the town, and amenities and facilities available to participate in sports and leisure activities; and enjoy the countryside
10. It is important however, to ensure that the built and natural heritage are also protected and enhanced. This is fundamental to a historic town in its rural setting

Background of the Civil area of 'Ongar'

11. The history of Ongar with a medieval small market town at its centre, in rural Essex supporting its rural hinterland of small surrounding villages and settlements, is confirmed by its local government bodies being Ongar Rural District prior to the formation of Epping Forest District Council (EFDC). In addition to Epping itself, EFDC includes the large urban towns on the edge of Greater London to the south as well as the outskirts of Harlow in the west.
12. Ongar, in the North East rural part of EFDC, consists of the historic town of Chipping Ongar, and the rural settlements of Greensted to the west and Shelley to the north. The latter is separated from Chipping Ongar by the A414. Marden Ash to the south is an urban settlement contiguous with the small town of Chipping Ongar

³ See ARUP Infrastructure Delivery Schedule for Ongar December 2017 which also lists present inadequacies; as well as Appendix1 Existing identified Issues for Ongar which includes some and inadequacies relating to Ongar; as well as the various Reports within EFDC support Technical Reports to the Local Plan

13. Ongar has a stable population, with little outward or inward migration. Population (2011 Census) was 6,251 which was only 3% increase on the 2001 figure. ONS statistics show that Ongar has :
- slightly higher than average 'aging' population
 - higher car ownership than in the southern well connected towns, with only approx. 18% of households not owning a car
 - a large % of the working population now commute out of the area to their place of work (including to London)

General Comments about EFDC Local Plan

14. ONPCG welcome the philosophy of applying recognised Place Shaping criteria and Garden Town principles to development in EFDC Local Plan and the detail in many of the Policies, as well as monitoring through Quality Review Panels, but as will become evident, consider that these policies have NOT necessarily been applied to the small town of Ongar and its surrounding rural settlements.
15. ONPCG also consider that EFDC have missed the opportunity in trying to more fully redress the situation of inadequate car parking throughout the District. This includes commuter car parking near transport hubs
16. ONPCG would want Policies to be flexible enough to support local Neighbourhood Development Policies in emerging Neighbourhood Development Plans where they are not in conflict with National Policies or the approved Strategic EFDC Policies
17. ONPCG is concerned, however, that the Infrastructure Delivery agreements with Deliver Partners are not advanced enough to fulfill EFDC's obligations to delivery such infrastructure as needed.
18. Ongar is due to have its 590 houses early in the Plan between 2020 and 2026, so is particularly worried about having Houses occupied without the essential services and infrastructure.
19. EFDC should be commended for the tremendous amount of detailed work and commissioned Technical Reports, achieved particularly in the last 15 months to December 2017. That has been particularly evident, in the Garden Communities in the Harlow and Gilston area, of which 3 out of the 4 Garden Towns lie solely or partly within EFDC. In addition they have been required to provide Masterplanning.
20. A similar "holistic and comprehensive approach" should have also been applied to Ongar's development, because of the high percentage growth of around 25% housing within a 6 year time span and at the beginning of the Local Plan period and the effect that could have on its community. This would have enabled Garden village ambitions supporting sustainable lifestyles and a retention and enhancement of the best features of the historic town and its surrounding neighbourhood. Thus Policy P4 is unsound in not being positively prepared. The lack of an overall Masterplan for an enlarged Ongar population has also lead to many other aspects in Policy P4 also being unsound as a consequence of the fundamental lack of urban design to the area.

Application of Policies in P4 to Ongar

General

21. Although small, (population 6251 in 2011 census), Ongar is still an important part of the rural community as a 'mini' regional centre serving its surrounding small villages and settlements in the North East of the District. This has been the case for centuries.
22. Chipping Ongar has many Designated Heritage Assets and an Ancient Monument in the Town Centre and has Greensted Church within the civil area of 'Ongar'. It is not only the oldest surviving wooden building in England, but the oldest wooden Church in the world, attracting around 100,000 visitors a year. Despite its significance, Greensted Church is not mentioned in Places P4 Ongar and only mentioned once in the submission version of the Local Plan on p70 under Visitor Economy para 3.70. Greensted ward is not even mentioned in the Places section for Ongar.
23. Neither is the Geographical location and position of its rivers noted, which is again most relevant. Chipping Ongar has two rivers (the Roding and the Cripsey) running north to south on its west and east sides with significant flood zones.
24. The main west- east road in EFDC the A414 dissects Ongar between Chipping Ongar and Shelley. The High Street (A184) links the A414 (and M11) to A128 Brentwood Road (and M25 to the east) and A113 Stanford Rivers Road to Romford and London (and M11). There are no commuter train stations in Ongar. Bus services are poor with no evening services.
25. There is no evidence that basic urban design principles have been applied to Ongar, or that the principles of Masterplanning have or that the NPPF guidelines for sustainable settlements have been considered. An increase of approaching 25% within a 6 year time span needs careful overall planning to ensure Ongar's distinctive character is retained with a happy community. There is no evidence of this, nor even that planners have a comprehensive knowledge of the Ongar neighbourhood and its settlements. Thus the Policy P4 is unsound because it is not positively prepared.
26. There is no evidence that EFDC's Policy SP3 Place Shaping has been applied to Policy P4.
27. There is no evidence that the principles within the NPPF relating to sustainable growth and the wellbeing of communities to include open spaces, green corridors, walk and cycle routes to town centre and amenities etc. have been considered or applied.
28. The Resultant Policy P4 is unsound i.e.
 - a. Not Positively prepared. For the reasons given above, there is no evidence of overall objectively assessed development for the neighbourhood of Ongar and it is presumably assumed that a District wide sustainability appraisal by AECOM for example would be sufficient, despite only mentioning Ongar a couple of times. The 'comprehensive approach' was not applied at neighbourhood level in Ongar
 - b. Not justified. As no reasonable alternatives to EFDC approach were considered it cannot be justified

General Consultation

29. Proper Consultation with the community has been lacking as follows.
30. There had been no publication of the identification of the infrastructure needs for Ongar until December 2017; there have been no publicised proposals about identified possible alternative sites to locate the 'essential' or 'desirable' community amenities, facilities and open spaces, etc. etc. as specified in ARUP 2017 Infrastructure Delivery Schedule for Ongar⁴, or their proximity to new housing; hence there has been no publicised criteria of the main deciding factors.
31. Consultations should have included: OTC, ONPCG or the NP Subcommittee (to whom it reports), Ongar Academy, Ongar Health Centre and GPs, who are either Delivery Partners or represent sections of the local community, BEFORE the final submission version of the Local Plan was published. This has not happened to our knowledge and certainly has not been made public.
32. Thus the resultant Policy P4 is not legally compliant
 - c. There was insufficient community involvement⁵, and neither did it meet Consultation expectations with the Community
 - d. Although a hybrid of 3 options were decided on for the District, Ongar residents were unaware that Options B and C in the Sustainability Appraisal Dec 2017 AECOM suggested more growth for Ongar than in the draft Local Plan at regulation 18. It has not been publicised or discussed with the local community
 - e. Not consistent with NPPF NPPF Chapters 7 Requiring Good Design and 8 Promoting Healthy Communities and para 7 being "the 3 dimensions of economic, social and environmental" are not met for reasons as above.

Green Belt

33. Because Ongar is set in the Metropolitan Green Belt, with very little known brownfield sites it is accepted that all the new development for Housing will be in designated Green Belt, through lack of other suitable available land. Green Belt boundaries will need to be redrawn and protected from further erosion.
34. All chosen development sites are on the edge of the existing settlement, so will still have an effect on the 'openness' of the adjacent Green Belt. It will remain a sensitive area in this respect and also because of Ongar's many Designated

⁴ See ARUP Infrastructure Delivery Plan Part B Report part B incl. para 8.18 (2017) and Appendix 1 Existing identified Issues for Ongar being the Community's Lists of Concerns including finding sites or space for amenities and facilities, such as car parks, town parks and gardens, cycle routes and green and blue infrastructure, additional or enhanced education, health and welfare services, leisure and sports facilities and community halls employment etc.

⁵ including on decisions made including relating to AECOM's Sustainability Appraisal non-Technical summary 5.12.2017

Heritage Assets and Conservation Areas. Particular care needs to be applied to developments to lessen the harmful effects such as applying reasonably low density etc. SP3 B (iv). This has not been done.

35. The inclusion of some sites in the North east of Chipping Ongar parish and south east of Shelley parishes straddling the busy A414 would also contravene one of the 5 purposes of NPPF Green Belt Policies, namely para 80 "to prevent neighbouring towns merging into one another" The settlement of Shelley is distinct from Chipping Ongar. Para 80 is generally applied to prevent 'settlements' merging as well as towns.
36. As one of the fundamentals of the Green Belt has not been applied, ONPCG therefore consider that these sites should be reassessed alongside other residential site options.
37. It is also understood that all sites for Ongar are only available as suggested by Landowners first, rather than assessing and deciding what would be good for Ongar and then approaching Landowners to make their land available. Thus the Policy P4 is unsound in not considering what would be the best Place Shaping for an enlarged Ongar and then approaching Landowners to find availability and suitability when the sites are properly assessed.
38. Resultant Policy P4 is unsound: i.e.
 - f. Not positively prepared It has not been objectively assessed with an overall plan of where development would best suit the particular character and geographical proponents of the area before approaching Landowners and considering their availability and suitability. This is clearly the wrong way round when such a high % increase in houses is being 'planned' in a short time for a community that has had no significant growth for decades, until the last few years. There has already been approaching 200 new houses built or with Planning permission since about 2011, which has been done on an ad hoc basis. Thus applying proper Master Planning and Urban design is imperative for the additional 600 houses.⁶
 - g. not consistent with NPPF paras 73 and & 74 relating to Green Belt by permitting new development to merge two distinct settlements in the Ongar civil area.

Residential Sites

39. Applying Strategic Policy SP2 and the explanatory paragraph 2.65, it is accepted the only real option is Green Belt sites for Ongar's new housing sites.
40. The spatial options however, neglected to consider any expansion of the settlement to the east of Chipping Ongar, despite those to the north south and west being considered. Sites in the East were being put forward, (and are repeated in the new sites being considered in August 2017. Policy P4 is therefore unsound in not being positively prepared or the choices made being justified by excluding the East quarter without comment...

⁶ The 200 houses since about 2011 and the 590 now planned would equate with an increase of nearly a third in about 15 years (approx. no. of houses in Ongar is 2500)

41. New residential sites have been added since the 2016 Draft Local Plan, but with no Consultation with the Community, whose first knowledge was the published submission version of the Local Plan on 18th December 2017, making their inclusion unsound. It has since been noted that OTC were sent a list 'to note only' that some 169 sites throughout the district were being assessed. The lists were not generally publicised. Assessment was then stopped in October 2017 so that Planners could concentrate on preparing the submission version of the Local Plan⁷. This procedure shows unsound preparation which is not comprehensive. The chosen sites in the submission version cannot be justified if all of the offered sites were NOT subjected to the same criteria i.e. did not have proportionate evidence.
42. In Ongar, of the new sites being considered, SR 1019 has already had planning permission and SR 1029 is waiting for permission to be approved, ONG R6, and 7 are on the submission version, others have not finished being assessed.
43. Of those not yet having completed the assessment process, there has been no statement to say whether any of these sites will be added, if they pass the suitability criteria and rank higher than other sites. If so, are they to be additional sites or replace others which are on the list in the Local Plan at present. Despite asking, ONPCG has not had an answer from the planners. This again points to Policy P4 being unsound by not being objectively assessed and not justified by omitting some sites merely because the process is not yet completed.
44. Another point is that NONE of the chosen sites would be able to accommodate the community amenities and open spaces as listed as 'essential' in ARUP Infrastructure Delivery Schedule within the densities and net areas stated.
45. Some amenities and facilities need to be integral and within a residential site, i.e. forming a mixed development such as certain open space provision for children and young people, cycle routes and footpaths and green corridors etc.
46. There are no alternative sites listed anywhere in P4 to accommodate other 'essential' infrastructures such as a Town Gardens and Park, therefore the chosen 'holistic and comprehensive approach' was not applied to Ongar, where only Housing sites and one Employment site were considered. Again Policy P4 is unsound by not being objectively assessed and not justified
47. As previously stated Housing sites must not be considered in isolation when the total in a small locality within 6 years amounts to almost 600. This total has considerable infrastructure requirements which must be considered at the same time.
48. Thus the resultant Policy P4 is not legally compliant
 - h. There was insufficient community involvement or publicity relating to the inclusion of new sites since the Draft Local Plan in 2016 and neither did it meet Consultation expectations with the Community
49. The Resultant Policy P4 is unsound i.e.
 - i. Not Positively prepared. For the reasons given above, there is no evidence of overall objectively assessed development and infrastructure requirements for Ongar consistent with achieving sustainable development (see NPPF),

⁷ Emails were received from the planners by first tier councils to that effect and to Neighbourhood Plan Groups

- j. Not justified. Not all the reasonable alternatives on spatial options were accorded proportionate evidence. There is no justification for including new sites, or why they are preferred to other possible sites.
- k. Not consistent with NPPF requirements for sustainable development are not met. See NPPF (including para 70)⁸

Subjective criteria used for housing site selection and arbitrary decision making

- 50. EFDC (ARUP) criteria for suitability of sites contain some subjective criteria such as importance of Green Belt and Character of Landscape, alongside more scientific criteria of Flood zones 1, 2 3a &b or Agricultural Land 1,2 3, etc. Subjectively 'marked' aspects will be disputed by differing 'expert opinion'.
- 51. Thus by totalling these 'marks' is attempting to put the sites on a numerical scale to also include subjective criteria. This is flawed scientifically.
- 52. Because of some subjectivity in the criteria there should have been some flexibility when choosing sites for development. The best scoring sites may not fit well within the overall preferred spatial plan for the town (when that is reassessed!).
- 53. Sites with constraints such as Flood Zones, High Pressure Gas Pipelines across part of some sites, need further investigation and discussions (including with landowners/developers) to consider how well such constraints can be overcome, leading to a revised net area to be developed or only part of a site used for housing. There is no evidence that this has been done and some sites have been excluded without further investigation. This is unsound.
- 54. The Resultant Policy P4 is unsound i.e.
 - l. Not Positively prepared. The analysis leading to deciding sites is unscientific and flawed as explained above and not thorough for all sites. Therefore, the most appropriate sites may not have been included Thus there is no evidence of objective assessment for the sites for Ongar,
 - m. Not justified. Because it is not the most appropriate strategy, as illustrated above. The sites have not been considered against all the reasonable alternatives and there is not full proportionate evidence for all sites.

Fast delivery trajectory of houses in Ongar within 6 year timespan from 2020-2026 for 581 of the 590 houses

- 55. To ensure good integration of existing and new residents, all or most key 'essential' infrastructure must be in place in time as new houses are occupied. Failure to provide school places in Ongar when they are needed or doctors etc. will be detrimental to the cohesiveness of the Community and will affect its wellbeing. It is also unsound, being inconsistent with NPPF sustainable development policies

⁸ (NPPF paragraph 70) "To deliver the social, recreational and cultural facilities and services the community needs, planning policies and decisions should: "...ensure an integrated approach to considering the location of housing, economic uses and community facilities and services."

56. It would be unacceptable, given the length of time EFDC have been preparing their Local Plan, not to deliver 'essential' infrastructure' when needed for Ongar people, especially young families and indicates lack of adequate preparation of the Plan. Thus Policy P4 is unsound and not objectively assessed.
57. ARUP Infrastructure Delivery schedule for Ongar December 2017 shows that this has not yet even reached agreement stage with Infrastructure Providers.
58. There is little evidence in EFDC Local Plan to show that all the required infrastructure will be in place in time as new houses are occupied or that agreements with third parties are in place.
59. Other essential infrastructure such as road improvements, are even less able to be met in time for Ongar by the Highways Authority. But they also affect other parts of EFDC. Some are scheduled to occur during the Local Plan lifetime. *See also comments under Infrastructure Delivery*
60. The Resultant Policy P4 is unsound i.e.
 - n. It is not effective, because it is unlikely to be able to deliver these essentials when required by the community
 - o. inconsistent with NPPF sustainable development policies by not providing essential infrastructure for new housing developments

Rejection and exclusion of housing

61. EFDC have rejected or excluded possible housing sites in the civil area of Ongar (see also 'Subjective Criteria used for housing site selection section above). However, there has been no explanation for all of these, despite some included sites being of similar suitability number (according to data in Nathaniel Lichfield and Partners 2016 Strategic Land Availability Assessment). This is unsound and is not objectively prepared
62. Two such rejected sites in Ongar were, according to the landowners, also incorrectly described or attributed with incorrect problems pinned on them during the first part of the selection process and not remedied since.
63. Whilst not necessarily promoting those sites, these sites should have been reassessed and if still rejected, full reasons made public
64. Furthermore, there has been no consultation with Ongar Community relating to these exclusions, including with the Ongar Town Council and the Neighbourhood Plan Group. Thus there was no involvement in the decision to reject or exclude specific sites.
65. Opinions from the Community were only sought at Draft Local Plan stage in 2016, when the required number of sites to satisfy the housing allocation numbers had been agreed.
66. Thus Policy P4 would fail the legal requirement test for inadequate Consultation.
67. Thus Policy P4 is unsound as not being Positively Prepared. There is no evidence that the exclusions/ rejections were based on objective assessments. So the decisions are also not justified based on no proportionate evidence for all sites
68. Furthermore, informal talks between some landowners and ONPCG have revealed additional 'offerings' alongside housing to include community amenities and facilities

- and infrastructure. These were also apparently made to EFDC up to 2 years ago, but not disclosed or publicised to the community of Ongar. It is doubtful whether this is legally compliant either, nor is it within the philosophy of the Localism Act that such information is not shared with the neighbourhood.
69. There has been no opportunity to discuss the results of these discussions or possible emerging Vision and Neighbourhood Plan Development Policies with EFDC. Since October EFDC stopped discussions with Neighbourhood Planning Groups and stopped the completion of site selection/reassessment processes for a number of offered residential sites in Ongar and in the District. This action also makes Policy P4 unsound.
70. The Resultant Policy P4 is unsound i.e.
- p. Not positively prepared Not objectively considered because no reasons given for rejection and not considered with the other community benefits offered for each site. .
 - q. Not Justified because decisions were not considered against the reasonable alternative sites with all the non-housing 'offerings' for each site.

Considerations for Community Facilities, Amenities and other benefits to Ongar from landowners and developers offering housing sites.

71. The Local Plan submission does not indicate sites non-housing offerings by landowners /developers for community facilities, amenities, infrastructure or other benefits for the Ongar community. The Policy P4 is unsound it has not been objectively assessed.
72. The Infrastructure Delivery Policies and Schedules make it clear that developers will have to contribute in some way as yet undecided.
73. The sites in Ongar are relatively small to enable substantial benefits to the Community and still be financially viable.
74. ONPCG have knowledge about two sites to the East of Chipping Ongar at SR0315 and SR 0090 and the landowners' Proposals. (It is understood that EFDC also have had this information for up to two years.)
75. The Proposals include: affordable housing via Community Land Trust; A relief Road, Car Park with access to the Town Centre, opening up the Ancient Monument of Ongar Castle for tourism in Castle Gardens/country park, open space and playing fields.
76. EFDC have not discussed these benefits with Ongar Community including the Town Council and its NP Subcommittee or the Neighbourhood Plan Community Group, but could possibly resolve some of EFDC's problems in finding suitable land to provide these and also some aspects of funding.
77. Some of these suggestions by Ongar landowners lie well outside the expectations in the NPPF to contribute to community infrastructure and amenities, so should be made public and properly discussed and assessed before Housing sites are finalised for Ongar.
78. The Resultant Policy P4 is unsound i.e.
- r. Not positively prepared because not all options and offerings have been considered

- s. Not Justified because Policy P4 may not include the most appropriate strategy if not all options and offerings were considered

Density of Housing

- 79. The majority of the densities stated for the net site areas (although West Ongar Concept Framework ONG R1 and ONG R2 is missing but 234 housing numbers in indicative development area 5.8 is just over 40pha) is between 34pha and 40pha which falls within EFDC general guidelines including for the urban area of EFDC in the south, adjacent to Greater London.
- 80. Strategic Policy SP2 C (v) is not applied being: "*making the best use of land by ensuring that development densities appropriate to the location and size of the site*"
- 81. Furthermore para 2.87 states "*It is not appropriate to apply density ranges set out in Policy SP3 mechanistically but to consider the density appropriate to the location taking account of relevant factors to optimise potential including the local context, design, transport and social infrastructure.*"
- 82. Strategic Policy SP3 is particularly relevant to Ongar's historic settlement, where it states "*A (iv) lower density developments may be appropriate in other areas of the District. Some parts of the urban areas and some villages are particularly sensitive to the impact of intensification and redevelopment because of the prevailing character of the area and the sensitive nature of the surrounding countryside or built form.*"
- 83. All residential sites in Ongar are in existing Green Belt so are sensitive to intensification. The prevailing character of the old historic town and its surroundings is for a lower density than 30pha. This confirms a case for these relatively high densities to be changed downwards.
- 84. The Resultant Policy P4 is unsound i.e.
 - t. Not Justified because it is not applying its own proposed SP2 and SP3 policies as illustrated above.

Inclusion of public open space, green corridors, cycle routes etc. in new housing developments

- 85. As a factor of the high density proposed on the Ongar sites, there would be no room to incorporate the 'essential' and 'desirable' open spaces, green corridors cycle routes etc. to enable less reliance on cars for local needs as detailed in ARUP Infrastructure delivery schedule for Ongar Dec 2017 and NPPF policies for sustainable development..
- 86. Some of the smaller sites proposed in Ongar probably escape the levy towards infrastructure due to the relatively small number of homes to be provided and will have not practically be able to accommodate green corridors or cycle routes to connect to the Town Centre and Community Health Education and Leisure facilities
- 87. The sites offering the additional community benefits to Ongar as above (0315 and 0390) should be further investigated as to their suitability as well as the viability of the amenity and infrastructure proposals.

88. Furthermore, Ongar community should be fully involved in any discussions, including the Ongar Neighbourhood Plan Community Group and OTC/ NP Subcommittee
89. The Resultant Policy P4 is unsound i.e.
- u. Not positively prepared because sites have not been considered to see if they can accommodate ARUP's recommendations relating to community amenities etc.
 - v. Not Justified because Policy P4 may not include the most appropriate strategy if not all options and offerings were considered
 - w. inconsistent with NPPF sustainable development policies

Employment Sites

90. There should be an indication in the Local Plan, where the additional 1200 new residents of possible working age, will be working. Government guidelines expect there to be sufficient employment within easy travelling distance to minimise car travel. They are not sufficient work placements in Ongar itself. Are they in North Weald, the Harlow area or London? Do the houses still count as being sustainable development with no indication of employment sites?

Infrastructure Requirements

91. General ONPCG has serious concerns about the ability of EFDC to deliver the stated requirements "at a rate and scale to meet the needs that arise from the proposed development in accordance with the Delivery Plan" because some serious investment will be required, including acquiring more land for some of the types of infrastructure such as identified in ARUP's December 2017 Infrastructure Delivery Plan and Schedules, including for 'open space requirements, Community facilities, Sports and Leisure facilities, health workers, early years and nursery education and primary school facilities- all marked as 'essential'. Furthermore Ongar Academy cannot accommodate an increase in student intake without serious investment in more buildings and facilities etc. (see comments by Head teacher under Education in this section and also in Policy D4) Policy P4 is unsound by not being effective in the delivery timescale for Ongar
92. Nowhere in this Local Plan have these new sites been planned for additional infrastructure in Ongar. Neither has there been any indication that it is part of the overall enlarged urban design for the town and civil area of Ongar. Thus Policy P4 is unsound and has not been objectively assessed and prepared
93. ARUP's Infrastructure Delivery Schedule for EFDC including Ongar, was only published in December 2017. It is clearly still a working document, with estimated costs not all received, no CIL arrangements adopted by EFDC yet, no agreements with Delivery Partners yet and considerable funding gaps still present.. Thus Policy P4 is unsound There is no indication that infrastructure will be delivered on time, so is not effective and does not comply with NPPF policies on sustainable developments.

94. **Sports and Leisure** It is unclear whether the Sports and Leisure requirements in ARUP's IDP Reports are up to date because 4 Global's reports were also only published in December 2017! Thus figures relating to requirements for built leisure facilities, playing pitches and open spaces may require amending accordingly in the coming months. Some of 4 Global's recommendations relates to requirements in broad areas such as the NE part of EFDC rather than to places in EFDC Place Policies like P4 Ongar. Thus these recommendations cannot be applied as being objectively assessed information on the civil area Ongar. *[There is also a question about how objective and comprehensive 4 Global's data collection was in Ongar and its subsequent Recommendations, and how much 4 Global's Recommendations etc. were influenced by being informed that EFDC want to close Ongar Leisure Centre and build another outside the neighbourhood and vicinity of Ongar. 4 Global's report is being challenged in a variety of aspects]* See also ONPCG's Representation on Policy D4 on which there are also serious flaws relating to Ongar. **Thus Policy P4 is unsound**
95. Ongar is scheduled to have its new development early in the Local Plan period, approximately from 2020-2026, so will put pressure on EFDC to deliver.
96. **Policy P4 is unsound**
- the infrastructure has **not been objectively assessed**,
 - alternatives have not been proportionately considered so it is **not justified** and
 - there is a clear indication that Built sports facilities will not be delivered to meet new demand within 6 years, so will **not be effective delivery**
 - but are also likely to have the loss of the existing leisure centre from Ongar. This is **against NPPE** paras 73 and 74
97. **Traffic and Highways** Essex Highway Assessment Report of December 2017 acknowledges that more assessments will need to follow. It's concern with traffic flow and pollution levels include models with the effects of the growth in Harlow and to the north. However, it does not include relevant effects of this growth on traffic flows to the East which does affect Ongar, by linking the expected economic growth in the Harlow area with routes to the east coast ports or commuter travel towards Harlow and Stansted via the busy A414 (which dissects Ongar) or the intersections with the A184 (High Street) A128 to Brentwood and A113 towards London and M11(S). **Thus Policy P4 is unsound**
98. Through traffic affecting Ongar will increase due to the above as well as the opening of cross rail at Shenfield, improved Anglia train services into London and increased capacity of Central Line TfL at Epping. This is ignored. **Thus Policy P4 is unsound**
99. The by-pass mooted in 2012 Essex Highways Report on Choices and Options (and earlier years in the 1990s and before) is not even mentioned, so it is unclear why this is not still an option. **Thus Policy P4 is unsound**
100. Improvements scheduled at the Four Wantz and Coopers Hill will not ease traffic congestion and pollution in the High Street. Traffic is set to rise significantly as an effect of the large developments planned for Harlow and Gillingham. Significantly, an additional 1000 more cars are expected locally in Ongar alone without any other additional through traffic expected.
101. Furthermore, pedestrian safety in crossing the main A414 at peak times by young families taking young children from new homes south of the A414 to primary

school north of the A414 in particular is negligent. Neither is it considered that the elderly will also need to cross to visit the Health Centre. Thus Policy P4 is unsound on road safety aspects for pedestrians

102. If cycling is to be promoted within a settlement in line with NPPF policies and sustainable development, there has been no consideration how cyclists, including secondary school children, can safely cycle through an even busier High Street and navigate the 4 Wantz roundabout safely. Neither are there any suggested links or routes to surrounding villages and settlements. Thus Policy P4 is unsound Cycle routes linking settlements near Chipping Ongar is a lost opportunity and would have enabled more journeys without a car in line with Government policies.
103. At present the transport delivery programme falls short so that Policy P4 is unsound, neither considering all infrastructure requirements or being effective in delivery time in accordance with NPPF expectation.
104. Nowhere in the Report is there any recognition of the harm being done by traffic to Designated Heritage Assets in Ongar High Street, that because of their age, do not have proper foundations. The damage to the surface of the High Street by heavy HGVs highlights the damage that is being done to these buildings. Nowhere in the Local Plan is there any protection of this kind for our built heritage. This needs to be addressed. Policy P4 is unsound by neglecting to protect our Designated Heritage assets from unnecessary harm from unreasonable levels of traffic.
105. ONPCG urge EFDC to pressurise Essex Highways to
- a. deliver improvements at the Ongar roundabouts in line with Housing completion for Ongar
 - b. reassess scenarios to provide alternatives to increased traffic flow through the High Street and other factors in their report and those stated above, including pedestrian safety.
106. Education School places will be a top priority for the Community, including pre-school and nursery places. It is essential to the cohesiveness of the Community that all Ongar's children are found school places in Ongar as soon as they are needed. Evidence in ARUPs December 2017 delivery schedule report for Ongar makes it clear that this will not happen. Thus Policy P4 is unsound
107. The new Ongar Academy is already oversubscribed with approximately 380 applicants each year for the 120 student entry. The school was built for a maximum of 800 and despite the assertions of the Local Plan, extra capacity can NOT be facilitated without significant extra investment in buildings. Any expansion will need more than just more classrooms. Consideration needs to be given for dining space, assembly space, a larger sports hall (the current one is 3 courts), additional sports pitches, additional learning resources and specialist teaching spaces such as science laboratories. These will be very costly.
108. In addition the existing parking is already under the capacity required for the school when full. The Head teacher has not been consulted about how the school can be enlarged to accommodate more students and what timescales would be required. Thus Policy P4 is unsound and fails the legality compliance.
109. Health Services The new Health Centre may be able to accommodate extra GP floorspace, if it is able to take over another part of the building, originally

designated for other Health services, but there are serious issues with the lack of parking. The adjacent land that would have been suitable in part, has been put in EFDC's housing site list as ONG R3! There is no evidence that delivery of health services has been positively prepared or where additional services like Dentists will be accommodated. Again the Policy P4 is unsound.

110. In summary, now that ARUP's December 2017 Report have highlighted the issues of lack of land for delivery of some of the essential infrastructure, ONPCG strongly state that it is clear that the development in Ongar has not included any prior thought to the overall design for a greatly increased population in Ongar.

111. Thus the resultant Policy P4 is not legally compliant

- a. Community involvement has certainly been lacking since 2016. ARUP produced IDP Reports in 2017, so that anomalies and omissions identified by 'local knowledge' have not been able to be verified, neither has Policy P4 been amended accordingly as appropriate.

112. The Resultant Policy P4 is unsound i.e.

- a. Not Positively Prepared. The plan has NOT been "prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements"⁹ Infrastructure and development are interdependent so should be planned together from the outset. Infrastructure types (as identified by ARUP) and requirements were only produced in Dec 2017

ARUP's work is objectively assessed with documentation provided by EFDC, but with out of date Sports and Leisure and Open Spaces information. This was hurriedly reviewed by 4 Global who only published their Report in December 2017 at the same time that ARUP were also reporting. It is unclear whether 4 Global's findings were included in ARUP's report. Some of 4 Global's Recommendations relate to broad areas rather than to places in EFDC Place Policies like P4 Ongar, thus cannot be applied as being objectively assessed information on Ongar civil area.

There is no statement to indicate how any unmet requirements from neighbouring authorities of Chelmsford, Brentwood or Uttlesford, if any, have been considered including use of sports amenities and facilities (Built Facilities and Playing Pitches) by neighbouring villages and settlements who may be outside EFDC area, but where Ongar is its natural centre.

The criteria for Sustainable Development are not met without the appropriate 'infrastructure' requirements being located where the Housing is. The preparation requirements relating to Infrastructure has not yet been completed. There is no detailed strategy for supplying the Infrastructure in place yet.

Neither are the Transport traffic flow studies comprehensive, as stated above including the effects of through traffic or the damage that will be expected from additional loads to the foundations of Chipping Ongar's Designated Heritage Assets and pollution which will affect residents particularly in the High Street or shoppers, employees and other visitors to the Town Centres.

⁹ Taken from EFDC Representation Form Guidance Notes under Soundness: Positively Prepared Dec 2017

No safeguards are proposed for road safety of pedestrians especially with young families.

The 'strategy' has not included objectively assessed requirements on Education or Health Services, in part because appropriate bodies have not all been consulted including Head teacher of Ongar Academy!

- b. Not Justified. Because the Infrastructure requirements are incomplete and the delivery plan also incomplete and no alternatives have been put forward, P4 relating to Infrastructure cannot be justified.

Furthermore some of the evidence is not clear that it relates specifically to Ongar and its surrounding 'catchment area' of villages and smaller settlements. For example, in 4 Global's Built Sports Facility Report December 2017, only relates to a wider arbitrary demarcation of the north east of EFDC, rather than one relating to normal settlements and population area, or one relating to the town and its natural catchment area.

P4 is unjustified relating to measures to mitigate the effects of increased transport and traffic through Ongar. The only proposals are for improvements to the highways relates to two roundabouts, which will temporarily improve traffic flow at two points and no evidence that any other alternatives have been considered. There are no proposals to divert the expected increased traffic away from Designated Heritage Assets or Residents in the High Street or to mitigate or lessen the expected resultant pollution levels.

The assumption that Ongar Academy can simply accommodate a larger student intake is not justified; and there are no options for how Health Services can provide for the growth in population. Neither service has existing buildings capacity for growth.

- c. Not Effective There is no indication in ARUPs IDP reports including in December 2017, that 'essential' infrastructure can be delivered when required, in accordance with sustainable developments, to meet the new demand in the Ongar development phase of the Local Plan, including :-
- i. The Infrastructure Delivery Schedule is a working document, still at the beginning stages of the processes involved with all the Delivery Partners etc. and so many remaining 'unknowns'
 - ii. There are still considerable Funding Gaps to enable delivery, as of December 2017
 - iii. Not all sites have been identified where an increase of facilities/amenities is 'essential', nor practical arrangements relating to their actual location on the site, the detailed plans and funding required, or any negotiation already started with the 'Delivery Partners'
 - iv. There are no suggested possible 'new' sites in Policy 4 or elsewhere in the Local Plan to accommodate 'essential' new/additional infrastructure type e.g. Public Gardens and Park.
 - v. None of the chosen housing sites is large enough to include any of the ARUP identified 'essential' infrastructure types on site and deliver the required number of housing in an acceptable density or possibly still be economically viable.

- vi. Thus new land sites are likely to need to be purchased specifically for these purposes.
 - vii. As this process has started so late, and will take considerable time, the Infrastructure Requirements within the Policy 4 will be unable to be delivered within the necessary timescale.
 - viii. Proposed improvements dates to the two roundabouts will occur too long after the time scale for Ongar's development in the Local Plan
- d. Not Consistent with NPPF. There is no secured and agreed delivery of appropriate 'essential' infrastructure with Delivery Partners. Without this in place, building houses will not be consistent with the Sustainable Developments. Promoting the use of non-car journeys within a settlement has not been addressed. Safe cycle routes for residents and secondary school children cycling to Ongar Academy or within the settlement to the Town Centre and Community Hubs have not even been considered. With no proposals in place, there will be unavoidable accidents and more dependence on car transport.
113. There are concerns about the lack of Contingency Plans/Policies should EFDC not delivery its overall district housing requirement in the required time scales year on year. As the graph shows, EFDC delivery of housing supply falls a little short in the first few years, although this averages out so that the first 5 years on paper is enough. However, EFDC agreed housing numbers with adjacent East Herts and Harlow. Should the Gilston or other large developments fall behind schedule, due to infrastructure delivery for example, ONPCG are unclear about the ruling relating to Developers being able to come forward quickly with other windfall sites to bring the housing number back up to the requirements. Our concern is whether such Planning permission granted in those instances would then interfere with any good overall cohesive town design for Ongar, such as in an emerging NP for Ongar (and revised Policy P4).
114. Amendments to Policy P4 ONPCG want assurances that the ARUP infrastructure identification requirements at essential and critical levels are written into Policy 4 part E
115. Part E also needs amending to be consistent with the Dec 2017 ARUP delivery schedule for Ongar and any revisions
116. 4 Global's Reports need to be clearly included in ARUPs infrastructure identification, and amended accordingly if 4 Global's report is revised to be able to relate accurately to the civil are of Ongar and its natural catchment area of villages and settlements.

West Ongar Concept Framework of ONG R1 and ONG R2 (and consequences of the nearby ONG R4)

117. The Place Shaping of West Ongar Concept framework (ONGR1 and ONG R2) together with nearby ONG R4 does not consider basic urban design principles, the safety of the residents and pedestrians, the sustainability aspects and Green Belt principles of the NPPF. The following will indicate how that makes Policy P4 unsound. These 3 sites account for 397homes being approximately three quarters

Ongar Neighbourhood Plan Community Group

Email: Ongarfutureplans@gmail.com

- of Ongar's allocation of housing in the Local Plan with insufficient community amenities and facilities nearby or detailed in P4
118. It places nearly 400 homes around the main west- east A414 linking Harlow and the M11 to Felixstowe post via Chelmsford and the A12 trunk road. In the 2012 Choices and Options Consultation Essex County raised safety concerns about housing around this intersection, including for pedestrians. These concerns have not been addressed.
119. Young families in the 234 homes in the West Concept Framework would have to cross the A414 to the primary school, including at the busiest times in the morning. This is a major health and safety issue that has not been flagged up anywhere in the Local Plan. Essex Highways report of 2017 shows the traffic at the roundabout almost at capacity during peak periods before the expected increase of 1000 cars alone in Ongar. With the expected huge growth in economic activity around Harlow due to the London-Stansted-Cambridge corridor, traffic on this section of the A414 will increase significantly, including with commercial vehicles from the Harlow direction and private cars with the workers commuting from the Chelmsford direction.
120. Health and safety of young families and primary schoolchildren making essential journeys to school, should have been a major consideration when Place Shaping housing sites. There is no indication this has been considered at all. ONG R 1 and ONG R2 should have been rejected on safety reasons and alternative sites in Ongar considered instead. . The Policy is unsound and ONPCG urge the Examiner/Inspector to look very closely at the health and safety issues for pedestrians crossing the A414 from these sites.
121. In addition the grouping of ONG R1, ONG R2 and nearby ONG R4 would make the two settlements of Chipping Ongar and Shelley merge. This is against one of the main purposes of the Green Belt. ONPCG are strongly against this merging of the two settlements. Policy P4 is unsound being inconsistent with NPPF.
122. Should ONG R1 and ONG R2 still go ahead, in P4 ONPCG would expect that Policy SP3 part B (iv) to apply a lower density than the approx. 40 per ha for housing because of the particularly sensitive impact of developing:
- In the Metropolitan Green Belt at the edge of the settlement
 - where high density is not in keeping with the character of the historic town and adjacent Conservation area (of which it was originally part of the Grouping of School Buildings and playing fields) as per Policy SP3
 - an 'open space' Green Belt area known as 'Bowes Field', which the local residents have had free access to and have enjoyed for over a century as an informal 'village green' and community sports field. Originally the Great Stony School playing field, annual community events and annual fetes were also located here for decades. It was only shut off to the public when recently sold to Developers
- A lower density should have been applied from Policy SP3. It has not.
123. In view of various aspects that make ONG R1 and ONG R2 sites unsuitable, ONPCG would question whether the decision to include sites ONG R1 and ONG R2 are unbiased and not influenced by the relationship of EFDC with the previous

- landowner (a Council) of the former land of Great Stony school, knowing that the previous landowner would benefit from a change of use to residential.
124. Various individuals and organisations including CPRE we understand, objected at Draft Local Plan stage on the grounds of the biodiversity on these sites ONG R1 and R2, including purported sightings of protected species. Their protection has not been mentioned in Appendix 6: Site specific requirements for Site Allocation and concerns ignored Thus again Policy P4 is unsound and inconsistent with NPPF especially Ch. 11 Conserving and enhancing our natural environment and para 109 relating to biodiversity or applying its own SP3 and DM1 policies

Conclusion relating to Policy P4 Ongar

125. Policy P4 is unsound for many reasons as detailed above. This is largely as a consequence of not considering that an increase in housing and subsequent population (assuming the same average number of people per household as present) of nearly 25% within the 6 year period of 2020-2026 and nearly 33% within the period of 2011-2026 in Ongar is worthy of an overall Masterplan applying good urban design principles for the whole of Ongar.
126. The development is driven by landowners' offerings and an inflexible and flawed application of data to make decisions for adhoc housing sites in isolation, instead of
- a. First considering options on how a larger Ongar might look.
 - b. Then considering requirements for housing AND community services, facilities and amenities and other infrastructure TOGETHER
 - c. The above would have ensured that housing and amenity and employment locations seamlessly lead to an enhanced settlement of Ongar with sustainable development and open space, green and blue corridors in the right locations, etc. and enabling residents to have cycle paths and footpaths to the town centre and amenities.
127. Instead the selection of housing sites is driving the shape of the enlarged Ongar, but with flawed decisions and preparation as detailed in the sections above.
128. Infrastructure is a last minute add-on, so may not be in the best place for the community, and cannot be delivered on time leading to developments which are not effective or sustainable
129. No consideration is given to protect and enhance the natural environment or the exceptional historic built environment with its Designated Heritage assets and Conservation areas in Ongar.
130. This Policy P4 indicates that the authors have no real knowledge of the town or its character or the type of community Ongar is.
131. There has been an abundance of very recent 'technical' Reports published quietly in late 2017, but Consultation and Engagement with the local community of Ongar has been very narrow with a few Councillor Workshops and no general publicity or reporting back to the public about various options being considered. Thus Community Consultation has been poor since the draft Local Plan.
132. With no subsequent opportunity for those with real 'local knowledge' to bring anomalies and issues back to EFDC for discussion, Policy P4 has so many flaws and unsound decisions and proposals and actions. Many are listed in this Report.

133. ONPCG consider that Policy P4 needs to be completely revised. It is too flawed to just have minor amendments. ONPCG urge the Examiner/Inspector to instruct EFDC to redo the preparatory work and draw up a NEW Policy P4 which accurately reflects National policy in NPPF and for it to be able to implement the community's vision to enhance this historic town.
134. The present Policy P4 is likely to destroy Ongar's character and the wellbeing of its residents. A new Policy based on planning philosophy within NPPF guidelines and as afforded to Gilston and garden Villages is needed to result in a Policy tailor made for Ongar.
135. Effective consultation must happen with local people and representatives along the way, to include ONPCG and OTC and other community groups as appropriate.
136. Policy P4 has failed in all aspects of Soundness for most aspects of its Policy and also in it Legal Compliance in some places as stipulated in the body of this Report.

Representation
relating to
Policy P4
follows on next page

C.Representation relating to Policy D4

Introduction

1. Policy D4 is worded to enable unsound decisions to be made in removing an existing Facility without community knowledge or consultation. It is therefore a dangerously worded Policy and against the Localism Act and general code of conduct for Councils on 'openness' of government and could be considered unlawful.
2. The Policy detail has aspects which are contrary to NPPF Policy
3. Policy D4 is Unsound i.e.
 - a. Not Consistent with national policy NPPF Paras 73 and 74¹⁰ because it would enable the unjustified removal of an existing facility from the settlement.

Amendment to Policy D4

4. ONPCG therefore propose the altering of the wording in Policy D4 section H by striking out the words
"Other than proposals which involve the comprehensive relocation of facilities..."
This section needs striking out. As it reads at present, it paves the way for EFDC to relocate Ongar's Leisure Centre outside the civil area of Ongar with no involvement

¹⁰ NPPF para 73 and 74

73. Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities. Planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. The assessments should identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. Information gained from the assessments should be used to determine what open space, sports and recreational provision is required.

74. Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.

Ongar Neighbourhood Plan Community Group

Email: Ongarfutureplans@gmail.com

of the members of Community or any of its representatives, including Councillors, Community Groups etc.

5. In addition, ONPCG insist that any 'proposals' being considered by EFDC which would result in the loss of facilities, should require not just an 'Assessment' but that the 'Assessment' should be objectively made by an independent body approved by Sport England (in the case of leisure and sports facilities) and with a 'brief' that is known to and approved of by the community including OTC and the NP Steering Group/ONPCG.¹¹
6. These amendments to the wording of the Policy D4 are NOT minor amendments but are major amendments and fundamental to local democracy, the Localism Act. NPPF paras 73 and 74 need to be reinforced in respect of settlements such as Towns. ONPCG respectfully request that these are treated as major amendments or issues relating to D4 and dealt with by direction of the appointed Examiner/Inspector for the Local Plan
7. Suggested wording for **Policy D4 Community, Leisure and Cultural Facilities ...**

"H. Any development proposals that would result in the loss of community, leisure and cultural facilities must be accompanied by an independent objective assessment by an approved Body such as Sport England (in the case of Leisure Facilities) which demonstrates that the facility or land is surplus to requirements and that it has been unsuccessfully marketed for a minimum of 2 years. The assessment must also evaluate the quantity and quality of existing facilities in the locality and assess the need and value to the community. The views of the local community on any loss must be sought as part of this assessment."

Inserts are in red
And NOT

H. Other than proposals which involve the comprehensive relocation of facilities, any development proposals that would result in the loss of community, leisure and cultural facilities must be accompanied by an assessment which demonstrates that the facility or land is surplus to requirements and that it has been unsuccessfully marketed for a minimum of 2 years. The assessment must also evaluate the quantity and quality of existing facilities in the locality and assess the need and value to the community. The views of the local community on any loss must be sought as part of this assessment."

¹¹ [This was not the case for the recent 4 Global assessments and Report. Although it indicates that Ongar has some existing unmet demand, ONPCG are still seeking more information on the criteria used for 4 Global's assessment. There is no clear evidence that the full ANOG method was used, including 'Availability' of facilities, or that data gathered by 4 Global could be used to apply to the small area of Ongar¹¹ rather than a larger geographical base. There has not been the expected 'Openness' in local government on this particular facility].

Supporting evidence

8. NPPF para 73 and Para 74
9. Localism Act 2011
10. Government policies on active health and Sport England's strategy on an Active Nation 2016-2021
11. Shifnal Neighbourhood Plan 2016, Policy LE1 Existing Leisure Uses. Ongar's emerging NP policies would be expected to be permitted to be similar, being consistent with NPPF policies.

Ongar's particular concern for needing Policy D4 to be amended

12. Ongar Leisure Centre has been identified by EFDC for closure¹².
13. Places for People (PfP) have no contract to maintain it after 2026 and have been told to expect it to close. PfP are reputedly already running down services and classes.
14. EFDC have proposed to build a new Leisure Centre in North Weald instead of in Ongar.
15. Some sports facilities have already closed at the Leisure centre including outside facilities. Several Ongar Sports Clubs e.g. Netball teams and Football teams have been forced to move out of the town due to these closures and further restrictions at the Leisure centre. Losses include squash courts, a 5 aside pitch and netball courts/tennis courts.
16. ARUP and 4 Global have identified existing unmet demand for Leisure facilities in Ongar in 2017. It is unclear whether this includes demand from the surrounding villages and settlements Ongar serves, or further afield towards Chelmsford in neighbouring authorities.
17. There have been no new/additional leisure facilities in Ongar since 2011.
18. Ongar is a civil area with above average participation in sports and fitness activities, including sports clubs, and this needs to be taken account in considering future demand or the effects of any loss of facility.
19. For the future, the proposed increase in housing for 590 between 2020-2026 and 200 already with planning permission in Ongar will bring an increased demand for Leisure centre facilities in the town. The existing housing stock is just over 2,500 so this will result in a considerable increase in demand.
20. Ongar residents are therefore understandably vociferous in their support of retaining Ongar Leisure Centre in Ongar. Many residents and organisations and Ongar Town Council made strong objections to the Draft Local Plan in which the Leisure centre site was to be redeveloped as housing and the Ongar Leisure Centre

¹² Confirmed closure of Ongar Leisure Centre is in the following: 4 Global's report on built facilities, Places for People's contract with EFDC to maintain Ongar Leisure Centre for 5 years instead of 20 for other Leisure Centres in the District, ARUP's Infrastructure Delivery Schedule for Ongar, and conversations with various EFDC personnel and Councillors.

relocated to North Weald. A petition of 2,500 names was collected, to have the site taken out of the Local Plan for redevelopment as a residential site.¹³

21. Although the site of Ongar Leisure Centre has been removed from the residential site list, as indicated above, there is evidence that EFDC still intend to close the Centre and replace it in another part of the District i.e. North Weald, which would not suit Ongar catchment and leave many residents in this rural part of the district, with no Leisure Centre they can easily access.
22. ONPCG will strongly resist the relocating of Ongar's Leisure centre outside Ongar civil area. EFDC are fully aware of the continued strength of feeling on this matter.
23. It is therefore imperative that Policy D4 part H is amended, because as it reads at present, it paves the way for EFDC to relocate Ongar's Leisure Centre outside the civil area of Ongar with the existing wording, **with impunity!**

Appendices

follow on next page

¹³ See Appendix 2 Letter accompanying Petition and submission re draft Local Plan relating to Ongar Leisure Centre and 3 pdf of Report on the effects on Ongar of the proposals in Epping Forest District Council Draft Local Plan March 2017 as a separate pdf

Appendices

Appendix 1

Existing identified issues¹⁴ for Ongar

- Public Transport is poor with no commuter train line connecting to London and inadequate bus services to support commuters
- Many of the Town Centre retailers and weekly Market traders are struggling to be viable. There are only two multiples in the town, being a Sainsbury and a small Tesco
- Town Centre Car Parking is only just adequate, but Car Parking for the new Health Centre, Ongar Academy, Ongar Leisure Centre and Ongar Innovation and Enterprise centre, which are all in a 'community hub' area of Shelley are very inadequate
- There is no town community 'park' and inadequate open spaces within the built up civil area¹⁵
- There is unmet demand for Leisure facility use¹⁶
- There are inadequate number of available playing pitches for the demand¹⁷
- There is a need for a by-pass to the High Street and its Designated Heritage Asset Buildings in the Conservation Area¹⁸
- The roundabouts at A414 and A128 intersection at 4 Wantz north of the High Street and A128 and A113 at the top of Coopers hill south of the High Street are nearly at capacity during the morning and evening peak periods¹⁹
- Primary Schools have waiting lists (held at Essex County Council) and some local children are having to go to schools outside Ongar civil area, which is detrimental to the cohesiveness of the community, especially as many parents also commute out of the area to work
- The new Ongar Academy which opened in Sep 2017 with 352 students, is oversubscribed with approx. 380 applications for each of the last 2 years. Its capacity is for 800 students only. The building and facilities cannot increase to this number without considerable new buildings and investment.
- The new Ongar Academy has no hockey pitch, only a ¾ sized sports Hall (KS4 netball cannot be played in the Hall), 2 MUGA netball courts, no all-weather playing pitches and relatively small changing facilities compared to other²⁰ secondary schools.

¹⁴ From EFDC Issues and option 2012, Local Plan supporting Technical Reports on Town Centres, Housing Delivery, Community engagement in Ongar in June and July 2017 at two separate public events and others as referenced

¹⁵ 4 Global report 2017 on open spaces etc.

¹⁶ 4 Global Report on Built Leisure facilities 2017

¹⁷ 4 Global Playing pitches Report 2017

¹⁸ Essex Highways response to Issues and options consultation 2012

¹⁹ Essex Highways Traffic report 2016

²⁰ Information from David Grant Head teacher of Ongar Academy

Appendix 2

Letter to EFDC Officers and Leader of the Council and Portfolio Holder To:

Names have been omitted

20th July 2017

Dear Sirs

Ongar Leisure Centre

You will be aware that there is serious concern amongst Ongar residents and users of Ongar Leisure Centre about its proposed closure to make way for new housing on this site, which includes a much needed car park for the nearby Health Centre.

We fully endorse Ongar Town Council's Report on the effects on Ongar of the proposals in Epping Forest District Council Draft Local Plan, which was presented to EFDC on 10th March 2017, as attached. This provides more information than was previously disclosed to the community.

We repeat that the loss of this amenity is contrary to NPPF paras 73 and 74. Now that there is a third tier in Planning Policies (i.e. Neighbourhood Development Planning) these paragraphs are particularly pertinent to our locality. Ongar is a small town with a population of 6,251 (census 2011), but which has always served the surrounding villages. Hence the doctors at the new Health Centre have 12,000 registered patients. Furthermore such a facility encourages active lifestyles amongst the community in line with Governments' philosophy.

As a small group, we also raised awareness in the Brentwood Gazette (Ongar has no local paper) and Ongar News (a monthly publication) and have gained support in our campaign to stop the closure of our much used amenity. We are now a large group!

We were encouraged by EFDC engaging Sport England and 4 Global to reassess the needs for sport provision throughout the district with the expected growth in population. We understand that Ongar and the villages also had a voice through some of its Town and District Councillors at a workshop on sport provision earlier in the year.

Although none of our group was consulted about our use of the Leisure Centre during 4 Global's consultation process, we trust that local factors have been applied to the Sport England's recognised ANOG general criteria in respect of leisure centre provision. We have been advised through an RTPI affiliated member who attended a Sport Provision workshop by RTPI in London 'Planning for sport and recreation' and aimed at Local Authority planners on 11th May 2017, that not only is the quantity, quality, accessibility and availability relevant in gathering information on supply, but that the local population profile and local sports participation is relevant in addition to national levels when assessing demand. Furthermore there is likely to be unmet, latent and future demand to be accounted for. We appreciate that the Active Places Power, Sports Facility Calculator and Facilities Planning Model are tools recommended by Sport England and trust that all local factors for Ongar Leisure Centre catchment have been applied, rather than generally for the district. We would

Ongar Neighbourhood Plan Community Group

Email: Ongarfutureplans@gmail.com

therefore appreciate knowing what considerations have been applied, and how the evidence has been collected in recommending a future for Ongar Leisure Centre.

We would also appreciate a copy of the draft report from 4 Global and to have the opportunity to have any further input, well before the EFDC Local Plan is finalised and ready for Regulation 19 Pre-Submission Publication, which we understand is scheduled for January/February 2018.

Whilst fully understanding that you have a difficult task in producing a Local Development Plan that residents will find palatable, we are the people with the local knowledge. That knowledge sometimes does not appear in district documents, so we trust that it has been comprehensively researched to form your evidence base for the future of Ongar Leisure Centre. With the government promoting the Localism Act of 2011 and Neighbourhood Planning Act 2017, as well as Neighbourhood Development Planning forming an additional tier in the National, Local (district) and Neighbourhood planning policies, the emphasis is now on 'neighbourhoods' i.e. to have more of a say in planning matters. We are fully aware that there is not yet a Neighbourhood Plan produced for Ongar, but the process has started. Ongar people have already indicated their desire to have sports provision and leisure facilities included as part of their Neighbourhood Development Plan and will be looking for enhancement or development of such provision.

Please find attached our petitions of some 2,500 people and some of the comments that were put on social media as 'Save Ongar Leisure Centre'.

We trust therefore that you will be willing to meet our representatives and work together for a satisfactory outcome for Ongar. We are aware of the issues relating to the age of the present leisure centre building, and some of the cost involved in updating such a facility.

To summarise though:

- Ongar Leisure centre is well used by residents and local schools (although PfP no longer operate waiting lists for classes. Therefore unmet demand is no longer quantified). It serves Ongar and the surrounding villages to the north, east and south.
- Land was originally bequeathed to Ongar people for a swimming pool over 50 years ago and has been well used since that time and that should be respected.
- Because of its location on the boundary of EFDC (and that people like it!), it attracts users from out of the district, including Uttlesford DC, Brentwood BC, and Chelmsford CC. It is widely known that a leisure centre with a location on a boundary will attract users from over the boundary and that the authority is able to operate a higher membership or usage charge, thus benefiting its own ratepayers.
- Existing users of Ongar Leisure Centre would not necessarily move to a new location in North Weald. Those that do so would need to travel by car, including the youth, who would largely rely on their parents giving them lifts.
- The existing location in Ongar is/will be within walking distance of many homes, the school and the health centre, so is located in a natural community hub.
- Some existing users of Ongar may have to stop using any leisure centre facility at all should it move out of Ongar and others may find alternatives out of EFDC district (and revert to

leisure centres and swimming pools in their own district.) Examples include:-those that do not drive, including the elderly and the youth; and schools who will find the extra journey time make it difficult to justify within the packed curriculum.

- In view of the lack of other facilities in Shelley, the proposed number of new dwellings in that locality (being in the region of 600 without building on the Leisure centre), and the proximity of the new Academy school and Health Centre to Ongar Leisure Centre, a more imaginative Strategic Development Plan for Shelley area is needed. This is also being considered by Ongar Neighbourhood Plan Community Group.
- Shelley and increasingly Ongar, has a youth problem since ECC withdrew funding for a Youth Club. Some regions in the country have provided facilities that youth enjoy within their built leisure facilities, by embracing the changing trends in facilities and participation. This may be an imaginative way forward, which could also increase revenue. Ongar Leisure Centre also has outside space, which could also be enhanced for youth activities, outdoor gyms etc.

We look forward to hearing from you and having the opportunity to discuss options for the future of Ongar Leisure Centre.

Yours sincerely

Save Ongar Leisure Centre Group leaders

Names have been omitted but are available on request of the Examiner/Inspector

Appendix 3

Report to EFDC on the effects of the Local Plan on Ongar March 2017

This is as a separate pdf attachment