

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

Stakeholder ID	2985	Name	Mary Dadd
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Letter or Email Response:

Comments to the general overall draft local plan 1. Although 'evidence' for the decisions is quoted in the Local Plan, these documents are not included even with (hyperlinks) so that residents and other consultees can easily assess them alongside the draft Local Plan, thus making it difficult to include 'evidence' to support a criticism of the Draft Plan which you state you require from local councils and residents. 2. Although stating that the District has effectively two different characters: the rural character outside the M25 and the essentially suburban and commuter belt for inside the M25, the majority of policies are wide and general in wording to encompass both types of communities, so do not differentiate, and are not specific enough to enable clarity in future planning decisions. Furthermore the replacement of the more specific previous Local Plan policies such as CP3 (new development) , various H policies and Green Belt policies in particular with the very general wording in the new Draft Local Plan will enable developers to exploit this and result in what will be seen in future as bad planning decisions. 3. Green Belt. NPPF is not specific enough relating to inappropriate building in the Green Belt or setting out what are very special circumstances would allow building in the Green Belt and local policies are required to strengthen the ideology behind the Framework. Other councils such as Brentwood (also with a high % of metropolitan Green Belt in its area) have included Local policies. I feel strongly that EFDC should include similar policies. There has already been (in mine and other residents' opinions) a speight of 'inappropriate' or 'very special circumstances' new builds in the district for which the LPA's decisions are already highly subjective and seen by the public as being inconsistent, and perhaps that the Officers are struggling to interpret the existing policies or just ignoring the Green Belt general criteria as laid down in the NPPF. I would like to see EFDC consult with London Green Belt Council (londongreenbeltcouncil.org) RTP1 and CPRE and provide robust local policies to ensure the preservation of the Green Belt in the future 4. Infrastructure. The Draft Infrastructure Delivery Plan 2016 is crucial to delivering the vision and actual development of the district, but in the time available to put in a response, I have been unable to see and therefore read it (but have noted Theydon Bois' comments relating to this). Also I have been unable to see a definitive report on the present infrastructure including capacity levels. The existing situation regarding adequacy of utilities is not complete in D3 of the Draft Local Plan as it does not include the existing issues with surface water in Ongar High Street or reports from utilities, but names a couple of other areas implying they are the only ones in the District with existing inadequate infrastructure. 5. Other infrastructure comments in the report are inaccurate or missing. Examples are that there is capacity in Ongar for schools, which is untrue. (Primary school children are already being bussed to two other rural primary schools in opposite directions which undermines community coherence. There is no mention of emergency services provision now or for the future. 6. Transport, traffic and parking. The transport policies and statements do not adequately address the consequences of the extra housing, which are many. The draft Local Plan lists of household not owning cars, without relating it to location and type of

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the household or the age of the occupancy. Again there are two distinct areas in the District e.g. those in Buckhurst Hill who can walk to the central line to commute to work and walk to shops and essential facilities and services and have reasonable bus services. In the rural part outside the M25, fewer workers are now agriculturally and locally based, with a high proportion commuting out of the District to Chelmsford, Harlow and Brentwood, and some to London. There are few employment sites in the District outside the M25. EFDC intend for population growth in the rural areas round North Weald Bassett, Ongar (and Theyon Bois although there are many commuters to London here via the central line) as per the Draft Local Plan. For those residents in Ongar North Weald and the northern small villages and parishes there is poor public transport so a reliance on cars. This will grow with the new number of houses and we can expect that 2+ households with both persons working will need 2 cars. Furthermore an aging population will have to give up driving as they get older and be reliant on walking and local bus services or community transport to shops and services, which are non-existent in the north of the District. 7. Having argued above that the number of cars will increase (say 1200 for the proposed 600 new houses in Ongar and therefore throughout the district roughly in proportion), not only will it cause massive increase in congestion over the next 17 years, it will have huge implications on car parking requirements in town centres, health centre locations, education establishments etc. and at all central line stations. This must be included in the Draft Local Plan. Car parking in some places in the District is inadequate, such as most central line stations, NHS centres e.g. The new Ongar War Memorial Health Centre, some schools e.g. Ongar primary school, etc. Instead of proposing how this situation is going to be addressed and also for the future demand, the Draft Local Plan ignores the problem and states that no car park spaces will be withdrawn. This is also inconsistent in Ongar with the proposal to replace the Leisure Centre and car parking with houses (The Leisure centre car park is used as an overflow carpark for the new Health Centre). 8. Car parking issues will also affect the environment of new housing unless the housing policy is realistic relating to car ownership and insists on two off-street parking spaces for all new dwelling and more for family homes above average size (they will have visitors and teenage children's vehicles to accommodate as well.) Country lanes and narrow housing estate roads cannot accommodate street parking. Planning policy for car parking should also apply to extensions to existing housing to ensure that sufficient car parking space is provided where extra bedrooms are built. 9. There are already unresolved congestion problems in the District such as M11 and J7 roundabout. Planning proposed new development to towns must also provide answers to increased traffic flow and congestion problems. This has not been addressed in Ongar, which also has existing considerable through traffic from Brentwood (A128) and Romford and Chigwell (A113) joining the Chelmsford/Harlow A414. This is regularly exacerbated whenever there are holdups or congestion on the M25 and traffic comes via the town from J28 of M25 to J7 of M11 including with HGV. Ongar has requested a by-pass since before the 1960s but has regularly been refused. This is becoming a serious problem for the foundations (and overhang of one listed building) of the many Listed Buildings in this Conservation Area and should be addressed before any new developments are permitted to go ahead which would add to the congestion of traffic. i.e. not just the proposed new houses in Ongar. 10. Leisure and Cultural facilities. Proposals for increasing the Community Leisure and Cultural facilities are lacking in the draft Local Plan where there is expected to be any significant increase in population e.g. in Ongar, where they are proposing to remove the Leisure Centre and build a new one in another town, which will be inaccessible and lost to most local Ongar residents. This is also inconsistent with the draft Local Plan which clearly in D4 states that leisure and cultural facilities would not be taken away. Instead the plan is to build more houses in its place and thereby producing a greater need for the facilities that are being withdrawn! 11. Housing Needs. The SHMA and OAHN were not available in the limited time span for me to read. I would question the need for such a high number of new housing. Buckhurst Hill, Chigwell and surrounding area have limits to growth, except higher density infill and brownfield development because of Metropolitan Green Belt restrictions which has been an effective way of preventing the metropolitan sprawl since it was first introduced. Developers prefer the easier building of greenfield sites to those of brownfield. There is growing evidence (see London Green Belt Council) that London could solve its housing shortage using brownfield sites within the Greater London Boroughs. The London Stansted and Cambridge corridor is promoting development of this corridor and includes Harlow, which also wants to regenerate its town centre. There is a strong case for EFDC allocation of housing to be reduced by transferring more to the LSCC corridor areas and also in the case of the northern rural parts of the district outside the M25, because there few local employment sites and lack of demand for them, poor public transport and lack of trains and the local economy does not demand such an increase. Any new housing will create more commuter problems to the employment locations of Harlow Chelmsford and London. Increased commuter travelling times also is detrimental to the well-being of those concerned. The proposed development of Debden/Loughton could arguably accommodate more housing to ensure that

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the new retail park, employment sites and educational proposals are successful. It would also reduce commuter traffic if workers live close-by. 12. Appendix 5 on Housing numbers quotes the NPPF in accounting for a 5% oversupply of sites to allow for choice and competition. This surely does not mean release land from Green Belt restrictions to create an oversupply for choice! Once a parcel of Land is removed from GB protection, it is very unlikely it will ever be restored. Currently EFDC show offering 2,600 more houses over that 5% amount, including Green Belt sites (Draft Local Plan Appendix 5). This is premature because as I understand it, there is yet to be an up-to-date register of Brownfield sites in EFDC as required by government in due course. No Green Belt should be released at all to find the Housing need until ALL brownfield sites have been identified and assessed and developed if appropriate. Exceptional circumstances for releasing Green Belt, according to London Green Belt Council and government spokesmen and RTPI is NOT to supply more houses unless there are other very special circumstances as well. It may be that the development of North Weald Bassett and its airfield is an exception, but again evidence must surely be shown. I completely endorse North Weald Bassett Council and Theydon Bois Council responses and reasons for not releasing Green Belt land and feel strongly that these principles should also be applied to the release of about 700 around Ongar and adjoining Fyfield see appendix. Comments on Policies and detail affecting Ongar Town area (Chipping Ongar, Marden Ash, Shelley, Greensted and adjoining parishes

1. I fully support Ongar Town Council's response to the Draft Local Plan and wish to comment further as follows:
2. From Draft Local Plan EFD Council's Vision for Chipping Ongar Chipping Ongar will continue to reflect its current local and independent character, providing services and amenities to a wide catchment of residents and visitors. Future development in the town will support Chipping Ongar being self-sufficient and will be accompanied by the provision of local services and infrastructure, including -supporting non-car based modes of travel. Chipping Ongar will balance utilising its existing heritage and leisure assets (including the Epping Ongar Heritage Railway and connections to the Essex Way) with the protection and enhancement of the settlement's historic environment. This is likely to differ from the vision of many residents as highlighted above and explained below a. 'support Chipping Ongar being self-sufficient'. Ongar has not been self-sufficient for many decades and is unlikely to be again, because of the decline in agriculture, its lack of local employment sites and location near other strong employment and its small size. The weekly market is rapidly declining and the retailers are struggling. The one nearby Fyfield Business centre is not being intensified but given over to housing! b. -supporting non-car based modes of travel. This is unrealistic. Ongar has no train station and private bus company services to limited destinations. Residents commute to a variety of destinations, so have to rely on their own transport (usually a car). There is no community provided transport for the disadvantaged or elderly and neither is this indicated being provided in the Draft Local Plan. One must therefore assume that residents will remain being reliant on cars. The existing congestion and expected increase in traffic congestion due to the proposed development sites as well as more development in neighbouring areas, will add to the problem. c. will balance utilising its existing heritage and leisure assets (including the Epping Ongar Heritage Railway and connections to the Essex Way) with the protection and enhancement of the settlement's historic environment. Heritage and Leisure assets are completely different and require different 'vision'. Nothing is set out for either in the Draft Local Plan, except to remove the Leisure Centre (and its overflow car parking for the nearby new (and too small already) health centre, when the need will be to enhance and enlarge it as the population grows. There is little financial support for the sports facilities No acknowledgement is made that Ongar itself is a Conservation Area and should be protected from harm such as any increase in traffic which would harm the foundations of the buildings and in some case the overhanging upper floors of listed buildings by HGV parking on pavements etc. (i.e. Kismet where protective bollards have been damaged and not replaced). There has been no vision by EFDC as to how Ongar's heritage assets including an Ancient Monument and Greensted's Church of St Andrew and the heritage railway can be enhanced such as with grants for tourism or similar from EFDC
3. The residents' vision is more likely to be as mine-valuing its rural location, but fairly near to work, with good existing Doctors and NHS, good schools, little crime and with good outdoor space and sports facilities, country walks and leisure centre with swimming pool and gym.
4. Inadequate existing infrastructure, facilities and amenities. The Local Plan has not identified that the new Health centre is nearing capacity and has no room to expand; both primary schools are full and local children have to go elsewhere; the new secondary school is already oversubscribed; policing levels are due to decrease not increase in line with population growth and there is questions about the ability of the other emergency services maintaining their levels; the waste water drains are insufficient and there needs to be a proper assessment of the sewerage capacity and mains water supply (some areas suffering low pressure suggesting that the system is inadequate) There is no mention of the patchy broadband and mobile phone signals and what is being planned to improve the situation.
5. Housing. In the Local Plan ' mixed views were expressed on the amount of development

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Chipping Ongar should accommodate. Some thought it should accommodate its share of the District's growth while others considered too much development was proposed through the Community Choices, which may affect existing residential amenity' Ongar has approximately 5 % of the District's population. 700 new houses (including at the Fyfield Business park) out of the purported 4,500 new houses the EFDC needs before 2033 is an increase of 28% and far above its 'share' Furthermore its location, lack of employment sites, lack of public transport, only basic community amenities (it does not own a public hall as Budworth Hall is privately owned) and lack of land that is not in the Green Belt or a Conservation Area do not make it a natural choice. I would therefore question why Ongar has been singled out for this unsound decision by EFDC? Ongar area does not have a neighbourhood Plan to date and its residents have not put itself forward for such large growth. There is concern by residents that this is only being considered because nearby landowners are keen to develop here and the EFDC is trying to justify the location. 6. With a register of brownfield sites in the settlements of Chipping Ongar, Marden Ash and Shelley, I would expect that our true local needs for new housing would be met for years to come by redevelopment of identified brownfield sites or non-viable properties, for which compulsory purchase orders should be made if necessary. 7. Stated strengths and weaknesses of Ongar. None of the key strengths and weaknesses in 5.71 of the Draft Local Plan have been acknowledged or addressed effectively in the draft Local Plan. 8. Green Belt. My biggest concern is the release of Green Belt surrounding the three settlements of Chipping Ongar, Marden Ash and Shelley. In the EFDC Green Belt review, all these sites had High harm to the Green Belt where some others in the district would have lower harm values suggesting that other sites in the district should be released if Green Belt needs to be released for development. Furthermore there is no evidence to justify that 700 new houses are needed in and close to Ongar rather than somewhere else, or that Ongar would benefit from funds to provide better community amenities and services. Figures quoted in Theydon Boise and North Weald's responses suggest a much lower figure of natural growth. If more growth is expected because of the London Stansted Cambridge corridor, housing should be provided near the employment sites and CI Levies applied. Similarly with Debden/Loughton to support a vibrant settlement with the area's top retail facilities, higher education establishment and employment. 9. The allocation of housing for Ongar should be drastically reduced and based on real evidence. Once a realistic figure is discussed and agreed, they should only be in small developments to ensure that the character of the town is not harmed. I note that Chigwell, who have a neighbourhood Plan have also stipulated this and this is supported by EFDC. 10. An up to date register of brownfield sites in the Ongar Town Council parishes needs to be carried out, and suggestions made for possible redevelopment before any Green Belt is released. 11. Traffic. The main sites offered up by landowners to the N and W of Ongar may appear to be sensible as a paper exercise (or using google maps) IF Ongar is to supply such a large increase in housing. However, this does allow for real local knowledge and topography. All major sites if developed will have major consequences for existing and future residents of the small town. This is because a. Ongar town is on a busy 'A' road and crossed between Ongar and Shelley by another 'A' road. Traffic is mainly through traffic. At peak periods there is already congestion including turning right onto the major routes. Hence the need for a by-pass b. One site to the NW is near to a flood plain. The loss of the biomass and addition of hard landscaping (houses) in its place will cause more flooding AND over a larger area c. The Greensted Road site is onto a narrow country lane with several points where two cars cannot pass. The additional overall congestion from 1200+ more vehicles from the proposed 700 additional houses in Ongar by 1026 (as per Appendix 5 of the Draft Local Plan- Housing stats) and no solution of traffic management or bypass, will involve Greensted Road being used as a rat run (and unofficial by-pass) re- joining the A414 nearer to the M11 at Blake Hall Road 12. Ongar already has an atypical congestion problem because it is centred round the intersection of busy A class roads, also regularly increased whenever the M25 and M11 have holdups. This has not been acknowledged. Therefore any new housing site feeding on to any of the A roads has a logistics problem particularly at peak times. 13. There is no proposal for a By-Pass, but this is badly needed. It also negatively affects trade in the town. 14. Traffic at present is also harming the foundations, and in some cases the fabric, of the many Listed Buildings fronting onto the High Street in the Conservation Area. As all District Councils are planning development over the next 17 years, no doubt this through traffic will increase even if there is no new building whatever in Ongar. 15. Any large site if agreed, must only be released as Green Belt land in stages over a number of years to ensure that a. It is still Objectively Assessed as a Housing Need in that location b. Any development is limited to small developments to retain the character of Ongar and allow full integration of the community and allow for the increase in utilities, services and amenities to be implemented before another phase of development takes place. c. The Housing and Traveller Trajectory timescale (Appendix 5) needs to be amended for Ongar parishes. At present almost 130 will be finished by 2021, almost 400 more in the next 3 years to 1024, with the remaining 75 by the end of the year 20125/6. This is far too rapid a

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development programme to be completed in just 10 years from now! (Does it reflect the wishes for landowners' who have offered the land) 16. I also repeat that NO Green Belt land should be released for development until all the brownfield sites in EFDC have been registered, assessed and developed, particularly as the NPPF suggests 'earmarking' a 5% surplus to enable choice and market competitiveness. Comments on the consultation process arrangements 1. I registered in early 2016 with EFDC and via OTC to be informed about progress and consultations relating to The draft Local Plan and have heard nothing whatever from EFDC or OTC 2. My neighbours and I in Greensted have not received the leaflet that was supposed to be distributed to every household in October about the consultations and The Local Plan. (I also understand that many other residents in Ongar itself did not receive this leaflet either. 3. The EFDC information to Ongar and adjoining parishes via an afternoon and early evening exhibition was inadequate in providing an outline of what the Plan included, how proposals had been decided on, what it meant for Ongar and district etc. A public meeting was needed in Ongar, because of the scale of the development proposed, with proper information by the Planning Officers and questions and answer sessions. OTC also decided not to have a public meeting but one to one sessions. The Planning Officers were not present to answer questions so it relied on local councillors and one district councillor to answer as best they could. Residents were basically left to do their own research! 4. The EFDC's supporting evidence was not easily available to be able to verify or otherwise and understand the EFDC's decisions to make certain proposals and what the full extent of option there were. 5. The questionnaire is unwieldy. Without reading the Plan fully and comparing with previous Local Policies, a resident cannot give a truly informed opinion. Most people are reasonable but do not like to feel they have not been given enough information to make a decision with such longstanding consequences. 6. There are many very unhappy and worried people in Ongar, who attended the exhibition and council meetings and who may or may not respond individually, particularly if they are elderly. There is also feeling that the Consultation process, by being very quick and not properly publicised to Chipping Ongar, Marden Ash, Shelley and Greensted residents, that our concerns will not be addressed. I sincerely hope that is not the case. As a newly co-opted Councillor on Ongar Town Council as of 1st December 2016, I will be urging Ongar Town Council to seek further discussions on EFDC's justification for the sites in the Ongar Town Council area that are in Green Belt, before the next stage of the Local Plan, and in the same way that Theydon Bois is asking, that the housing sites presently lying in the Green Belt are no longer part of the Local Plan and will not be included in the Pre-submission version of the document. EFDC should look at providing more housing near the employment and retail centres of EFDC and neighbouring areas such as Harlow and Loughton/Debden where there would be sustainable location, with education establishments, employment sites and strong retail demand, with existing good transport connections by way of the central line or overland trains, proximity to motorways and good public transport. Any traffic management issues are more likely to get funding and support from County and Government level for improvements than Ongar small town. In conclusion, my comments about increasing the housing and population of Ongar as proposed in the Draft Local Plan 700 new houses (which exclude new buildings completed in the area between 2011-2016) is not only an unrealistic number for Ongar area to accommodate, but also vastly disproportionate to its share within the District, and not sustainable. i.e. 28% of the still to find apparent 4,500 when Ongar population is only 5% of the EFDC population. According to studies it would also not be its natural expected population growth. The draft Local Plan would result in Ongar being an overspill isolated location for workers having to commute elsewhere, changing the character of the town. This would be particularly evident as the proposed timescale is for all of the development to be completed by 2026, and the majority in just 3 of those middle years between 2016 and 2026. While appreciating that the factors in deciding where to recommend development in EFDC are complex, I had understood that the District Council and East of England region were in favour of • Developing Loughton and Debden to be the prime retail, employment and educational location in the District. • Developing Harlow within the London, Stansted and Cambridge Corridor To minimise commuter traffic etc., houses should be available close to accommodate the expected increase. Therefore the call for housing land should be redistributed to those areas and any Green Belt land only released in those areas firstly. The EFDC Green Belt Assessment report August 2016 indicates that releasing many sites would result in moderate or higher harm to the Green Belt on all aspects assessed. Therefore surely the most appropriate proposal should be to release only Green Belt land where other factors of sustainability and desired development are satisfied. And after brownfield and urban sites are exhausted. Ongar is not self-sufficient, nor will be and release of Green Belt for 700 houses (including the nearby Fyfield site) would not be sustainable. • Most of the working population (from a total of 7,500 in the three settlements of Chipping Ongar, Marden Ash and Shelley, and the hamlet of Greensted) already commute outside the District • There is little employment sites for existing or new residents • The utilities such as water and sewerage, broadband are inadequate • Schools are over subscribed • The new Health centre has no

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space to development and other NHS services are stretched • The retailers are struggling, with shops changing tenancy regularly • There are no trains to serve commuters • The bus services are limited and there is no community bus service • There are few council owned community amenities and only limited privately owned ones • The policing has diminished and other emergency services are constantly threatening to reduce services and relocate • There is only limited space in the town for car parks. Added to this, EFDC has not recognised fully the constraints and potential for Ongar because of its Conservation Area status with many listed buildings, an ancient monument, the nearby Grade 1 Church of St Andrew at Greensted (the oldest wooden building in England and also oldest wooden building in the world) linked by the Essex Way, and also the heritage railway. Unfortunately most of the traffic is through traffic on the A128 connecting to the A414 between Chipping Ongar itself and Shelley. A By-pass would solve some of the existing congestion problems, but I could not find this proposal in the Local Plan. Furthermore, as EFDC has provided nearly 2000 more housing sites than will be required (see Theydon Bois response), the release of Green Belt land round Ongar should be removed entirely from the Draft Local Plan and housing redistributed to more appropriate locations near employment and retail and education areas in Harlow and Debden/Loughton. In fact NO Green Belt land in the District should be released before a complete brownfield registry of the EFDC is carried out AND all available brownfield sites considered suitable are developed, including by compulsory purchase if landowners do not 'offer' it for redevelopment. I urge the EFDC council not to release Metropolitan Green Belt and if necessary to put a good case to government for a reduction in our quota.

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