

**This document is written in response to the
Epping Forest District ‘Draft Local Plan Consultation 2016’
and in particular site ‘SR-0181’**

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The Windmill Cottage, Mill Lane High Ongar, CM5 9RQ**

9th December 2016



Image taken from Essex LI.SE, Revised: 1895, Published:

1897 clearly showing the field attached to the High Ongar Mill.

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SR-0181 is an ancient field that has not been built on for over a 1000 years

It is in the Green Belt but outside the village ribbon of High Ongar

Before we destroy it forever . . .



The Law:

“Once established, Green Belt boundaries should only be altered in exceptional circumstances”

“Inappropriate development is by definition, harmful to the green belt and should not be approved except in very special circumstances”

“The need for housing is not an exceptional circumstance”

Section 9 para 87/89 Planning practice guidance and Town and Country Planning Act 1980

Introduction

JR.1.1 There are factual inaccuracies in the draft report and we will provide evidence that will demonstrate that once a **'sound'** and completely objective review of the facts are made, then the recommendation to build on SR-0181 will be withdrawn. Step by step, we will show that any fair, balanced and independent mind could not draw the conclusion that this land should be recommended for building upon and should be removed completely from the Draft Plan.

JR.1.2 The 'proposed building area' SR-0181 has been misrepresented in details of its description, size, single ownership, access, site suitability, Green Belt values and other relevant details for site suitability. This document will set out the correct details. The lack of any mention of the widely known sewage problems in High Ongar, along with the large over subscription of High Ongar Primary School and no mention of an Ancient oak tree on site, all appear to have been ignored in order to recommend the building of another housing estate in High Ongar - 10 houses have been recommended as the minimum but no maximum is given.

JR.1.3 The Draft Epping Plan seeks to justify this site suitable for development of 10+ houses in High Ongar stating; *"This option provides opportunities to promote infill and settlement by **maximising existing urban brownfield land** and focusing development in lower performing Green Belt site immediately adjacent to the settlement"* Figure 5.21 Spatial options by settlement High Ongar

As the photograph on page 3 shows, this is not a Brownfield site and never has been. The Draft Plan goes on to describe SR-0181 as 'Scrub Land'. This is incorrect. SR-0181 is a field which until 1996, formed part of The Mill Lane Riding School. Indeed, the land still has stables on it. Arup scores this land as of 'No Green Belt value'. This is not true.

JR.1.4 To seek to build in High Ongar and to comply with Government guidelines all other plots within the village ribbon must have been considered and exhausted before any consideration is given to building on Green Belt. This is a fundamental flaw in the Plan Report. Section '4' of this document clearly evidences that there are several other sites within Millfield and other places in High Ongar, many on land already owned and in control of EFDC, that can easily be developed in keeping with their surrounds before the need to build on SR-0181. In particular and by way of example, the building line of the south side could easily be continued to allow 3-4 houses without the need to disturb any of the land shown on SR-0181.

JR.1.5 The desk based assessment (SSA) made by Arup considers 32 individual sub valuations in order to score each individual site as to its worthiness to be put forward for recommendation to build. This document challenges a number of these assessments in Section '3' and gives a detailed

evidenced based breakdown to demonstrate that some of the scoring is clearly NOT 'sound' or fair. An honest and informed score when applied to all the known facts will set out a clear case to re-score SR-0181 which will then remove it entirely from the Draft Plan's recommendation to build on it. For example, in one of the SSA scores (2.1) Arup gives the same score to SR-0181, a Green Field site which has two Tree Preservation Orders on it , as it does to the Waltham Abbey town carpark (SR-380). This is not logical or correct.

JR.1.6 The Green Belt remains the backbone protection of the countryside. The speculative Draft Plan for SR-0181 attempts to try to accommodate a prospecting developer who has put this land forward to build on. This should not mean that Green Belt restrictions are allowed to be side stepped in order to allow development.

Setting the scene

JR.2.1 This field is primarily set aside as 'Green Belt' for preservation under the provisions of the Town and Planning Acts. It was and still remains a paddock able for the grazing of horses. The field itself remains outside the village ribbon and should remain under the protection of Green Belt against property development. In order to make judgement on the development of this particular piece of land it may be of some help to outline a brief history of both the field, The Mill Cottage and The Windmill Cottage.

Mill Cottage, which pre-exists the windmill, was the original residence of the miller and is mentioned in the 'Doomsday Book'. In July 1935, the then owner of Mill Cottage, James Allinson, gave a large field to Epping Forest Council for the housing estate 'Millfield' to be built on (Land reg. EX 826438). There were various restrictions and stipulations tied to the transfer of the land.

At a simple glance of the outline plan of Millfield, one can quickly see that the estate was designed in such a way to preserve the maximum distance between the building of the new houses in Millfield and Mill Cottage in order to ensure maximum privacy between the estate and Mill Cottage. This is evidenced by the fact that all houses on the east side have very long gardens and no building lies immediately adjacent to The Windmill Cottage land. This remains the same to this day.

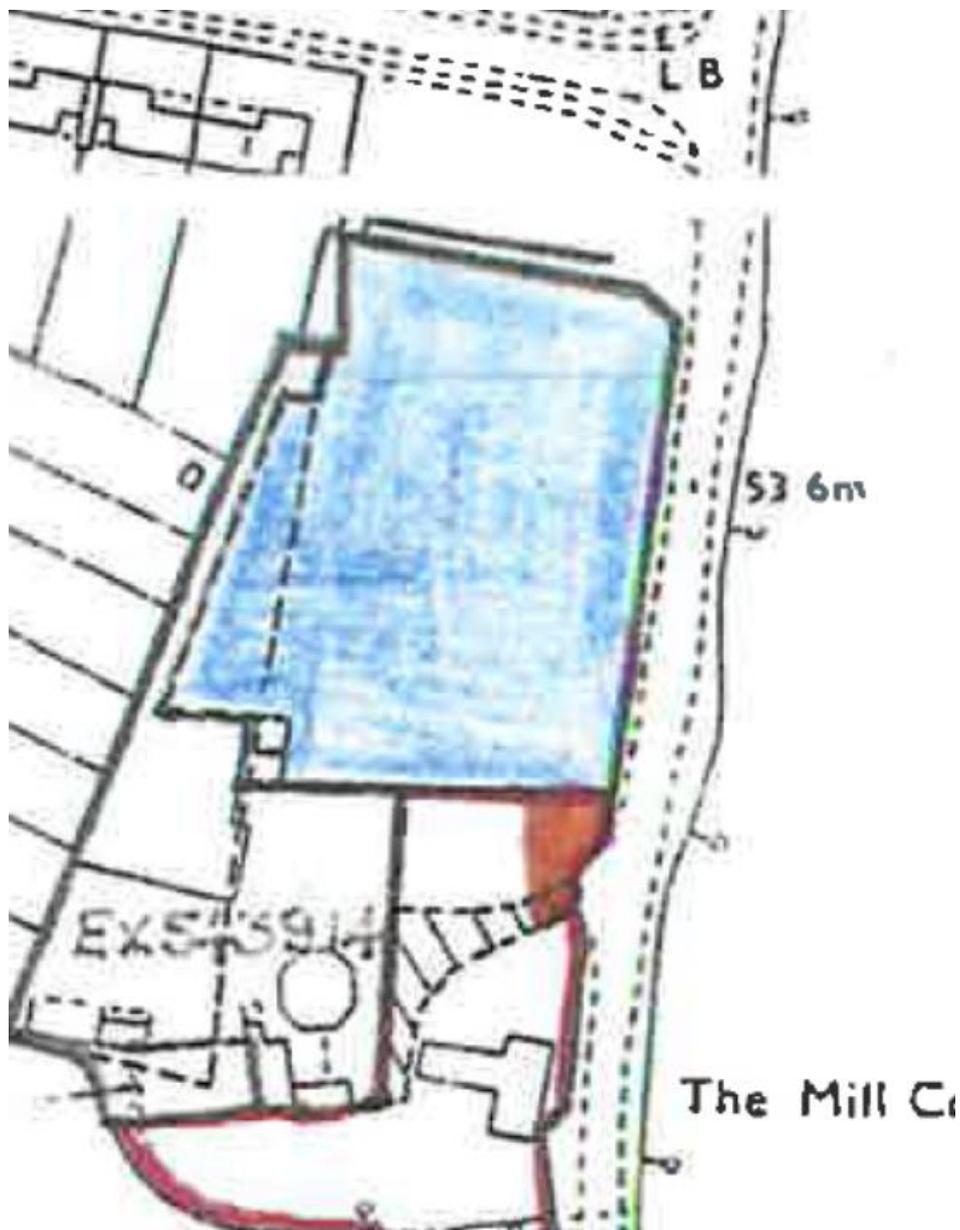
The field in front of Mill Cottage (part of SR-0181) remained tied to Mill Cottage up until August 2010, when the previous occupiers separated ownership of the field from the deeds of Mill Cottage for the purpose development.

The Windmill Cottage has arisen from existing buildings dating back to 1800. The oldest part was a windmill and was actively used as such until being struck by lightning in the late 1890's. The remains of a moat still exist at the rear of the property.

Evidenced based corrections to the scoring of SR-0181

JR.3.1 Multi Ownership

Arup DSA 1.1, claims the proposed build site is simply under 'single' ownership and scores it a Green (+). The boundaries shown on SR-0181, when overlaid with the Land Registry map incorporate part of the gardens of The Windmill Cottage and Mill cottage. This means land shown as SR-0181 is owned by Mr A Preston and or agent/developer, Mr & Mrs R Anderson (owner and occupiers of Mill Cottage), Mr & Mrs J Roos (owner and occupiers of The Windmill cottage). Furthermore, there are numerous easements and rights of access which would need to be untangled for SR-0181 to be developed. Therefore the **correct SSA score should be a Brown (-)**. The present scoring is a misrepresentation of the facts. A correct map is shown below. This map is drawn from Land Registry and shows the actual piece of land under the control of the developer shaded in blue.



JR.3.2 Scrub land

In Arup's Site Suitability Assessment (SSA), the author starts in the SLAA notes by describing SR-0181 as '*Vacant scrub land*'. This is a gross misrepresentation of the site. In recent history it was a field that was used for 21 years as a horse paddock. The mere fact that the owner then left the site to overgrow, should not detract from the Green Belt value of the site. It is of course in the owner's interest to leave it to overgrow to promote a description of 'scrub land'. Neglect is not an excuse to develop! Small paddocks are at a premium and in great demand in the local area.

Furthermore, the benefit to the local community of this Green Belt land should be considered in any proposal in line with Green Belt guidelines. Not surprisingly LUC in its Green Belt study; Fig 4.3 scores a top mark of 'Strong' value to the Green Belt and follows it up in Fig 4.5 'Potential level of harm to Green Belt harm' as '**Very High**'. Strange then, that Arup's SSA 2.1 classifies the Level of Harm to the Green Belt as '**None**' and scores a (0). This critical discrepancy must be reconsidered and corrected.

JR.3.3 No site access

There is no legal right of access to the field on SR-0181 other than a pedestrian access for ground maintenance (via Mill Cottage). The owner/developer is hoping that Epping Forest District Council will donate this. The developers land on SR-0181 is completely surrounded on all sides by Green Belt and therefore not part of the settlement of Millfield Estate.

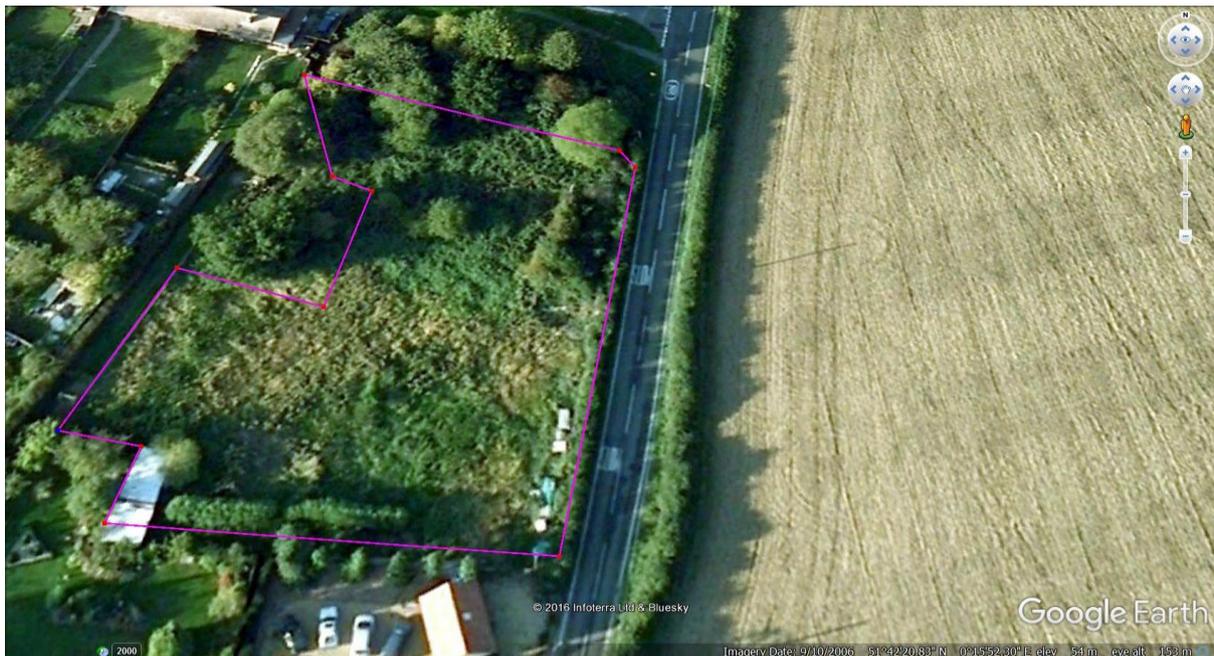
Access to this field directly from Mill Lane has been denied by Essex Highways on the grounds of safety as recently as 02.12.2010 (EPF/2475/10) stating; "*According to the submitted plans the applicant does not appear to control sufficient land to provide the required vehicular visibility splays of 215m x 2m x 215m. The lack of such visibility would result in an unacceptable degree of hazard to all road users to the detriment of highway safety*". I should be pointed out at this juncture that this section of Mill Lane is granted 'National speed limit' status and as such remains a very dangerous section of road. A local resident was killed in Mill Lane (very close to this section of land) some years ago.

Appendix B.1.4.2. – 6.4 scores SR-0181 as "*Suitable access already exists*" and scores a Green (+). This is factually incorrect. Two other potential sites in High Ongar with similar 'access issues' score 2 points lower (-) with the comment; "*Potential for access to the site to be created through third party land and agreement in place (-)*". A not dissimilar site SR-0819 with no access comments; '*unable to access site*' and scores it a double negative (--). **SR-0181 should have been scored (--)**. A score three points lower than it has been given. The discrepancy between the scores when added to the other inaccurate mis-scores clearly shows that this field should have been discounted at an earlier stage of the consultation process.

JR.3.4 SR-0181 size exaggeration-build Footprint

The proposed site SR-0181 has several errors in its display of boundaries in order to exaggerate the area of land available under single ownership. As can be seen from the image overleaf, it clearly

shows the area is significantly reduced once the correct boundaries are applied. The existence of 6 mature lime trees, which belong to the current owner of Mill Cottage and not the developer putting forward this parcel of land for development, and a large row of tall conifers are completely omitted from the Draft Plan, or are these simply to be bulldozed? The two TPO trees in the centre west of the site (the canopy of one ancient oak covers a significant area) are not marked on the Draft Plan. We have added these corrections to the picture of the land below.



Correct boundaries and the lie of the land should be accurately represented in order to prevent misunderstandings when considering whether to give admission to the Plan and subsequent grant of planning permission. Factual boundaries were also misrepresented by interested parties on a previous occasion when an application was made to build on SR-0181. Planning was denied as the field is Green Belt.

JR.3.5 Landscape

As can be seen above, the potential build area is reduced and there would need to be some cramming in to build 10+ houses. That issue coupled together with the land to development ratio, if taken from the nearest houses in Millfield estate and applied the same like for like plot density would allow for a maximum of 3.26 properties i.e. 3 houses. These could easily be built at the entrance to Millfield on the south side on existing land already owned and controlled by EFDC without the need to build on the field.

Arup's SSA section 5.1 'landscape sensitivity' scores SR-0181 a (0) with comment "Are able to accommodate development without significant change". It is difficult to accept such a score when the build ratio is going to be in excess of 3 times that of the existing buildings. Clearly, it will have a

dramatically detrimental effect on landscape sensitivity. It is proposed to change it from a field to a housing estate and therefore **should have scored a brown 'double negative' (- -)**.

In Arup's SSA section 5.2 in relation to *"Settlement character sensitivity"* comments *"development is unlikely to have an effect on settlement character"* and justifies this by saying *"Low density development is proposed which reflects the character of the area. Therefore development is not likely to have an impact on the character of the area"*, and scores it as zero (0).

Both Mill Cottage and The Windmill Cottage are detached houses with open aspects around the major part of each property in an open country field setting. The aspect of The Windmill Cottage faces northwards, i.e. directly overlooking the site of proposed development. Open views are enjoyed over the field/open paddock and leading up to the old part of the ancient village. It is a Conservation Area. 10+ houses would represent a major intrusion and undesired noise and light pollution from the occupants of such a development. This development would have a significantly negative impact upon our quality of life of the owners of The Mill Cottage, The Windmill Cottage and several adjacent properties.

The 10+ houses would not be in keeping with the rest of the housing stock in the vicinity and therefore **should score at least (-)**. **One could reasonably even score it lower (--)** as *'the development would substantially harm the existing settlement character'*.

J.R.3.6 Impact on Conservation Area

Arup's SSA section 1.8.a scores SR-0181 a Green (+) commenting *"No effect likely on historic assets due to distance from site"*. This really is an unacceptable score as its own framework guide lines clearly state; if *'the site is within 1Km of conservation areas'* it would breach the buffers. SR-0181 is some 458 metres from the High Ongar Conservation Area which also has various Grade II listed buildings and clearly breaches this 500m buffer. Therefore, the comment above 'due to the distance' cannot be correct. **The score should be another mark down to (0)** as clearly it is *"within the setting of a heritage asset and effects can be mitigated"*.

Another fact worthy of comment is that this proposed build is immediately next to the ancient site of the miller's cottage and the windmill, both having historical records going back to the early 1700's.

JR.3.7 Green Belt (Arup - score 2.1)

Here the report contradicts itself, LUC were appointed to comment on Green Belt. Parcel 023.4 was essentially a large area of land surrounding Nash Hall at the northern end of the village. Peculiarly, 023.4 shows this parcel of land as mainly a farm yard/industrial units area and being joined by two red lines running all the way down either side of Mill Lane to loop in the field of SR-0181. Could it be that this is where the comment *"This option provides opportunities to promote infill and settlement by maximising existing urban brownfield land and focusing development in lower performing Green Belt site immediately adjacent to the settlement"* Figure 5.21 Spatial options by settlement High Ongar Originates

from and was 'cut and pasted' into the Arup report. There is a conflict because on the one hand SR-0181 is described as a Brownfield site and on the other as Green Belt. Clearly it cannot be both. This clearly identifies an error in the desk based assessment!

LUC Figure 3.1 in stage 2 assessment sifts 023.4 at an early stage for a variety of reasons. How then did SR-0181 stay in? As it did remain in the Plan, why did it not score the same as the other Green Belt areas in High Ongar which we all dismissed with a 'Summary of Harm to the Green Belt' as **Very High** (fig 4.5) and a **Purpose 3 rating of Strong!** However, when one examines Appendix B1 4.2 (p 126-132) 2.1 Level of harm to Green Belt Arup comments; *"Site is within Green Belt, but the level of harm caused by release of the land for development would be none"* and scores a '0'. **The correct score should have been a Brown (--).**

It must be stressed that all the other sites in High Ongar were scored as very High or High value Green Belt, as was SR-0181 in the LUC papers, but changed by Arup to describe it as of 'no value'. How can this be correct? One could be forgiven for thinking "Is someone trying to sway in favour of the developer here"? This has not been a **'sound'** assessment. Until a fair assessment has been completed, SR-0181 needs to be withdrawn immediately from the Draft Plan.



Image shows joined photos of the field in 1999

JR.3.8 Open Space

Arup SSA 4.3 'capacity to improve access to open space' comments SR-0181 is; *"Unlikely to involve the loss of open space"* and given a score of zero '(0)'. This is incorrect. In order to support this development, access will have to cross the open village green area at the entrance of Millfield (photo below). This is public open space and is regularly used by local children to play and others to exercise their dogs (see photo). Using Arup's own framework this should mean that the proposed development would cause a total loss of this open space and therefore **should have scored a brown (--).**

Image of the public open space.



JR.3.9 Change of Village Ribbon

The Draft Plan also seeks to bend the planning laws to allow development. There has to be an exceptional reason. Attempting to squeeze in 10+ houses onto this small field is not such an exceptional reason. The Draft Plan makes no mention of the exceptional need in direct comment to SR-0181. What is suggested is to divert the Green Belt boundary around Mill Cottage and The Windmill Cottage in order to take the paddock out of Green Belt restrictions – no other reason. This is not a proper use of the Planning Laws. Section 2 above (JR.2.1), amply explains why the land has remained a field for so long. It must continue to do so.

The proposed change to divert the Green Belt in SR-0181 only affects three stake holders, the owner/developer, and residents of Mill Cottage and The Windmill Cottage. Strangely, no consultation was made with the residents of either property at an early stage when many of these issues could have been explained and the unsuitability of including SR-0181 in the Draft Plan, made obvious and therefore put out in the first sift.

JR.3.10 Ancient tree on site

In the centre to the west side of SR-0181 is an ancient oak tree that has a Tree Preservation Order on it. (See photograph below).



Part of the listed consultation documents of the Draft Plan is the 'Ongar Community Tree Strategy' (EFDC 2008). This document describes an 'ancient tree' as;

Ancient trees (sometimes referred to as veterans), are very old. Depending on species this normally means at least 250 years. Generally speaking they will be standing alone in the open as opposed to being found in dense woodland, and will likely show evidence of having been pollarded at some time during their life.

Their girth is likely to exceed 3m and, according to species, will probably be hollow due to the decay of the inner hardwood. This does not, however, mean they are dead. Far from it – they are very much alive and providing an invaluable habitat for wildlife as well as complementing the landscape and providing a fascinating historic link with our past.



The oak tree (above) sits on SR-0181 and has a girth well in excess of 3metres (3.3m). Its canopy covers an area of at least 18m x 18m. It has a hollow centre. It does stand alone and clearly provides a fascinating link to the past and has aesthetic value. It is clearly an ancient tree. As can be seen in the photograph little protection was offered when the site was being bulldozed recently i.e. an orange plastic tape, less than half a metre from the trunk of the tree.

It is surprising that Arup in within SSA 1.3b claims; *'No Ancient or Veteran trees are located on the site'* scoring a Green '0'. There are **23** other similar 'single ancient tree sites' in the SSA report which state; *"There is 1 Ancient tree directly affected by the site. The tree is located in the . . . (n, s, e, w) site and may be affected by development"* and all 23 score a Brown minus (-). **Therefore SR-0181 should be given the same (-) score.** Again, there appears to be some inconsistencies in the SSA scoring and another mis-scoring for SR-0181.

There is also one other tree on SR-0181 which also has a Tree Preservation Order on it. Its canopy would also reduce the build area of the suggested development.

JR.3.11 Primary School - over subscription

The 'Commissioning School Places in Essex 2015-2020' (6.2.3) report identifies High Ongar Primary School as one of 4 in the district of Epping as having 'deficit capacity' for the academic year 2014/15 and goes on to say they are experiencing significant pressure to accommodate the increasing number of pupil population and forecasts this to continue passed the academic year 2019/20, each year having a deficit capacity.

High Ongar School is a listed building in the centre of a Conservation Area and has been prevented from building more classrooms. It has been oversubscribed for some years. At present, families living in the immediate vicinity of the school are struggling to find places in the school for their children. 10+ new houses are not sustainable from a primary education point of view.

Peculiarly, in all the reports produced by Arup regarding site suitability, they do not include a section for 'impact on local schools'. It should be a double negative (--) score on the SSA. However Arup's score in section 3.5 (Distance to nearest infant/Primary school) for SR-0181 is a Green (+) which cannot be correct as the nearest school is full and pupils would have to travel to the next available school which would be over 2000m away and **should have been given a minimum score of (-)**.

JR.3.12 Utility capacity – full sewers

The residents of Millfield know only too well that the sewers are quite literally bursting. There are residents regularly calling on the Council to unblock sewers. Only 3 weeks ago, there was an issue of raw sewage pouring down the kerb gutter into the brook because of an overflowing sewer.

Local residents of Millfield objected to the knocking down of 12 garages (a valued local amenity) in order to build two, one bedroom single storey houses. One of the main areas of resistance was "where the sewage was going from these two houses"? Local people were told that no further pressure would be put on the local sewer and sewage would be dealt with in another way, but low and behold the sewage from these two houses will be tapped into the local sewer, causing even more pressure.

Peculiarly, in all the reports produced by Arup regarding site suitability, they do not include a section for 'impact on capacity of utilities'. Therefore the impact of building a 10+ housing estate and the further pressure this will cause to existing sewer pipes does not get a mention at all. **Surely this is a major consideration when building a new housing complex?**

JR.3.13 Infill

Arup describes SR-0181 as 'infill plot'. As can be seen from the image below, it is not. It is outside the village ribbon and is surrounded on all sides by Green Belt and the nearest buildings of Millfield are some 90 metres away from the centre of the field SR-0181.



The two orange coloured dwellings (Mill Cottage and The Windmill Cottage) shown in the image above are a considerable way from the settlement of Millfield. The proposed development cannot represent 'infill' as described in the consultation documents.

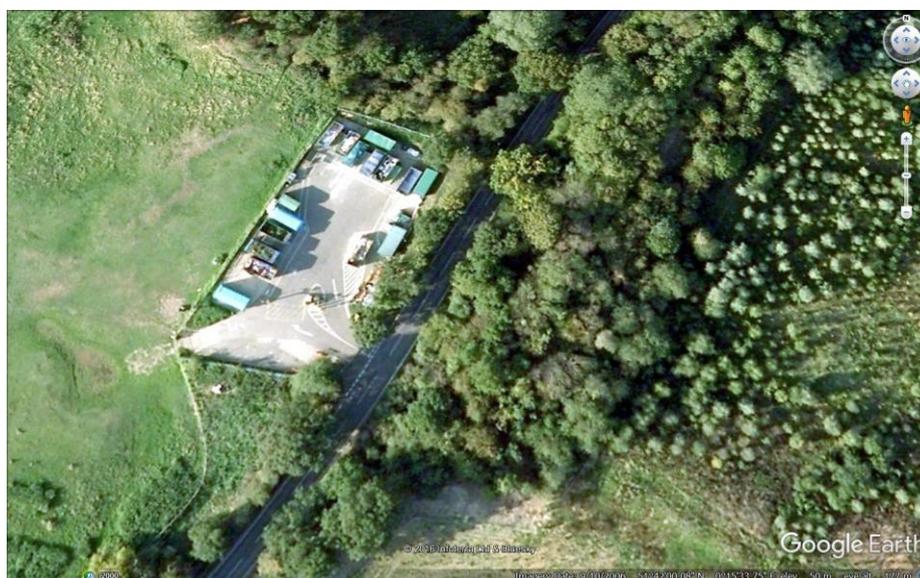
JR.3.14 Ransom strip understated

Direct access therefore being ruled out, the only point of access suggested by the report is via the very narrow and already overcrowded road entrance into Millfield and then across the very large piece of green open space measuring 35+ metres wide and 25 metres deep. To access the field SR-0181 via this route would require a 25 metres long service road being built just in order to reach the field called SR-0181. If granted planning for 10+ houses, then these could reasonably be expected to return a total of £4,000,000 to £5,250,000 on the open market, thus demanding a 10% 'Ransom' of £400,000 minimum and all 10+ houses being for the benefit of the developer and no local residents of High Ongar village. Regarding 'Ransom', Arup (SSA) comments that this is a "*minor issue to be dealt with at planning*". The fact of a significant Ransom having to be paid is given very little mention at all. Indeed, if this significantly large strip of land is to be sold to the developer for building and/or access then why has it not been put up for sale publicly in accordance with EFDC policy? If not yet, then assurances should be sought from the Council that it will be advertised in advance of any sale to the developer to ensure a fair opportunity is offered to alternative purchasers.

Planning

JR.4.1 Lack of consideration of other available/alternative Brownfield sites in High Ongar

The readily available build spaces in High Ongar have not been exhausted by any stretch of the imagination. By way of example, here are a few obvious and reasonable propositions to consider and which would add to the rental stock in Millfield and High Ongar. In High Ongar, the obviously prime Brownfield site for housing is the now vacant and unused recycling centre in Mill Lane (see image below).



This site has been closed for several years and has all the services laid on and has ready-made access to it. The site is sufficiently large enough for 3 good sized semi-detached (6 houses). This land again is under the single ownership and control of EFDC and would require no untangling of any land ownership or legal issues. There is no mention of consideration of this land in the Draft Plan. This is a very real option still open to EFDC.

Mention has already been made above of the land at the entrance of Millfield estate (photo in JR.3.8) where the current building line could be extended in order to provide two semi-detached buildings (4 houses), again on land owned solely by EFDC. No consideration for this has been made. If this land was used it would be in keeping with the other existing houses in Millfield without having to build on the SR-0181. The houses could of course be built for the benefit of the residents of High Ongar for rent, another very creditable and viable option still open to EFDC.

EFDC recently built 3 'straw houses' by squeezing an access road between two existing houses in Millfield and building the 3 new houses essentially in the rear garden of two of the existing Council houses. This was an EFDC led initiative justified as adding to the supply of available rental property. Strangely, when a local resident some 4 doors down from this site put in a very similar request to build 3 houses (EFD201/07), the planning permission was turned down. This option is clearly still open to EFDC to explore.



There is another option on the corner of Millfield adjacent to No. 6, where clearly the land would support a semi-detached building providing 2 similar one bed houses to that of the 12 garages which are being demolished. The map on the previous page gives an idea of how easily they could be incorporated into the Draft Plan. These three plots could all be taken together as one lot to meet the 6+ houses minimum required in the Draft Plan.

Conclusions

JR.5.1 Scoring

The chart below shows the Arup SSA scores for all the sites in High Ongar with totals at the bottom of each column. The last figures column shows the corrected scores for SR-0181 and demonstrates how clearly the low score takes SR-0181 out of consideration in comparison like for like scores with the other High Ongar sites.

	SR-0054i	SR-0054ii	SR-0054iii	SR-0393	SR-0458	SR-0181	SR-0181 Re-score	
1.1	0	0	0	0	0	0	0	
1.2	0	0	0	0	0	0	0	
1.3a	0	0	0	0	0	-2	-2	
1.3b	0	0	0	0	0	0	-1	Ancient Tree
1.4	0	0	0	0	0	0	0	
1.5	0	0	0	0	0	0	0	
1.6	2	0	0	0	0	0	0	
1.7	2	-1	-1	-1	2	2	0	
1.8a	-2	0	0	1	1	1	0	close to heritage site
1.8b	-1	-1	-1	-1	-1	-1	-1	
1.9	-1	-1	0	0	-1	0	0	
2.1	-2	-1	-2	-2	-1	0	-2	Level of harm to Green Belt
3.1	-1	-1	-1	-1	-1	-1	-1	
3.2	1	1	0	0	1	0	0	
3.3	1	1	1	1	1	1	1	
3.4	1	1	1	1	1	1	1	
3.5	1	1	1	1	1	1	0	Distance to Primary school
3.6	-1	-1	-1	-1	-1	-1	-1	
3.7	0	0	0	0	0	0	0	
3.8	n.a	n.a	n.a	n.a	n.a	n.a	n.a	
4.1	-1	-1	-1	-1	-1	-1	-1	
4.2	-2	-2	-2	-2	-2	-2	-2	
4.3	0	0	0	0	0	0	-1	
5.1	-2	0	-2	-1	0	0	-1	Landscape sensitivity
5.2	0	-1	-1	-1	-1	0	-1	
6.1	0	-1	-1	-1	-1	-1	-1	
6.2a	0	0	0	0	0	0	0	
6.2b	0	0	0	0	0	0	0	
6.3	-1	0	0	0	0	-1	-1	
6.4	1	1	1	-1	-1	1	-1	Access to site
6.5	0	0	0	-1	0	-1	-1	
6.6	0	0	0	0	0	0	0	
Total	-5	-6	-9	-10	-4	-4	-16	

As demonstrated in this table, Arup SSA scores identified are plainly wrong and will not stand up to scrutiny. One could be forgiven for drawing the conclusion that such basic inaccuracies and incorrect scoring have been tailored in an attempt keep SR-0181 in the Draft Plan, rather than applying the same rigor as afforded to the other five sites in High Ongar and which has resulted in all five sites being dismissed from the Draft Plan.

There should be a re-scoring of Arup's SSA with regard to SR-0181. The new score as detailed above will easily take it out of the recommendations to build. We seek to urge you to do this now. Not to do so would leave EFDC in a vulnerable position to have these issues taken to a 'Judicial Review'.

JR.5.2 Failure to review other declined planning 'new build sites' in High Ongar

On reviewing the many planning applications turned down in High Ongar in the last 10 years, there are a surprising number of applications denied that had the required size (6 or more dwellings). There is no mention in the Draft Plan to review these applications. Some of these are the size of SR-0181. Surely, these plots should be looked at again before the virgin field of SR-0181 is destroyed.

JR.5.3 Final comments

High Ongar has experienced a high level of 'New Build' housing over the last 15 years. It is a small village and the residential housing stock has doubled since 2000. High Ongar should be completely left out of this Draft Plan. The field SR-0181 should remain a field for the sound and well-founded reasons given above.

To seek to divert the Green Belt boundary around Mill Cottage and The Windmill Cottage and circumnavigate Planning Laws in order to support a private property development is unjustifiable. It will bring little benefit to the residents of High Ongar. 10+ private dwellings will do nothing to improve the local affordable rental stock and will leave the local people of High Ongar village feeling that Epping Forest District Council cares little for them and for those who want to live in a green, quiet, rural, and open countryside setting.

SR-0181 needs to be sifted out!