

Gypsies and Travellers Development Plan Provision
In Epping Forest
Consultation on Options Questionnaire

Part A

Name

Theydon Bois Action Group endorsed by Theydon Bois Parish Council and Theydon Bois Rural Preservation Society.

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Part B

Question 1

Objectives

Do you agree with the draft objectives?

Yes X

We have answered yes because we agree with the strategy of improving living conditions and health and educational opportunities of Gypsies and Travellers. However this question could as easily be answered No. We disagree with the first objective; it should refer to the EFDC target and not the regional target. The second part should be deleted, Gypsies and Travellers tend to gravitate to areas where enforcement of unauthorised pitches is lax. The second part of objective 4, the minimisation of the impact on settled communities should be paramount. Paragraph 64 of ODPM Circular 1/2006 states 'Issues of Sustainability are important and should not only be considered in terms of transport mode and distances from services. Such consideration should include a) the promotion of peaceful and integrated coexistence between the site and the local community. The consultation exercise will not gain any support unless this is recognised. The district should be promoting an integrated coexistence. In order for this to be achieved then the impact on the settled community should be considered more

highly.

Question 2

Focus of search for sites

Do you agree that the search for sites should be broadly confined to the west and south of the district closest to the main suburban areas, rather than the more rural Northeast of the district?

No X

No sites should be ruled out at this stage.

Question 3

Phasing of sites

Do you agree with the proposed phasing of pitch provision?

Yes X

Whilst we do not support the pitch numbers recommended, a figure of 39 is too high, we concede that the figures will be dictated by the Regional Spatial Strategy. We do not agree on extra pitches needed as a contingency; pitches need to be created where there is a genuine and identified need. Site allocations may impact existing properties; this must be kept to a minimum. There is a genuine fear, real or not, associated with the development of these sites and this fear should be recognised. We also feel that if and when sites are selected then maximum pitch recommendations per site as at Phase I, should be allocated to enable enforcement should the number of occupied pitches on the site exceed those set by the allocated pitch number.

Question 4

Scale of sites

Which option do you prefer for the typical scale of Gypsy and Traveller sites?

Option one X

Assimilation into the local community is far more likely to occur if the sites are small, a single family or single extended family. Larger sites would not encourage harmonious relations between Gypsies and Travellers and the settled population or between the different travelling communities, e.g. Romany and Irish Travellers.

Question 5

Concentration in Roydon and Nazeing Area

Which option do you prefer?

Option one X

No special restriction sites in this area considered on their merits.

This should not be a compulsory question. In principal we agree that it would be easier to see existing unauthorised or tolerated sites granted permission than finding new sites. No sites should be ruled out at this preliminary stage. In principle, we prefer to see existing unauthorised sites, particularly those that are currently regarded as 'tolerated', granted permission as it reduces the need for completely new sites to be identified. Epping Forest currently has 114 authorised

pitches and 13 unauthorised pitches, 400 – 500 individuals and traditionally there is a good relationship between the travelling and settled community here. The Eastern Region already accommodates 25% of the total UK Gypsy and Traveller population. Essex and Cambridgeshire accommodate more than the rest of the region, 53%. Epping Forest District accommodates the second highest allocation in the County at 20%.

Question 6

The Main Possible Strategies

Option three X

Wider distribution throughout the district.

As stated in question 5, EFDC already has a large number of sites. Concentration in a small area will put undue pressure on local communities which is at odds with paragraph 54 ODPM Circular 01/2006 'Sites should respect the scale of, and not dominate the nearest settled community. They should also avoid placing an undue pressure on the local infrastructure.' Sites should have not only a wider distribution throughout the district but should have a wider distribution throughout the county and country. No sites should be ruled out at this stage. However where opportunities arise to develop Gypsy and Traveller sites as part of an urban extension or areas where appropriate developments come to light within other urban extensions such developments should be considered on their merits.

Question 7

Site Search Sequence

Do you agree with the proposed site search sequence?

No X

We disagree with the site search sequence. EFDC is unable to provide documented evidence of the sites that were considered and then dismissed prior to the published selection document. The principal criterion should be the minimisation of conflict with the settled community as per paragraph 64 ODPM Circular 1/2006. The Joseph Rowntree Foundation paper (Providing Gypsy and Traveller Sites: Contentious Spaces 2007), supports the process of the Local Planning Authority promoting good relations within communities. Whether rightly or wrongly, this is the predominant difficulty faced by any authority seeking to allocate new Gypsy and Traveller sites. Pretending that these applications are the same as mainstream planning proposals, and that factors such as minimising the need to travel or having good access to local services should have a significant role, is disingenuous.

Question 8

Large Urban Sites

a) No X

Whilst we would certainly prefer development of brownfield sites in the urban areas outside the Green Belt, we are of the opinion that site size should be less than 5 pitches. Agreeing with this statement would depend on the specific area of

20% of a site larger than 1 hectare. It would be potentially more difficult for larger pitches to be harmoniously integrated and we believe minimisation of conflict with the settled community should be paramount.

b) No X

The development of Gypsy and Traveller sites in the Green Belt should not be a special circumstance.

Question 9

Sites as part of the Harlow Urban Extensions

No X No X

No locations should be ruled out at this stage. Development of sites in either of the Harlow Urban Extensions could offer the opportunity to develop purpose built provision which could be suitable to both the Gypsy and Traveller and settled communities. However we feel we unable to offer comment at this stage, as there are no indetified sites or plans available. We reiterate sites must be small and the minimisation of conflict with the settled community must be paramount.

Question 10

Sites as part of Urban Extensions

No X

As already stated, it is difficult to successfully incorporate Gypsies and Travellers into an urban environment close to traditional housing, especially on large sites of 15 pitches or more. Appropriate 'windfall' sites may come from the 'call for sites' exercise; however each should be considered on its own merits with the emphasis on smaller developments.

Questions 11-19

No X

Question 20

Possible sites in the Roding Valley area

20a No X

20b No X see site specific response

20c No X see site specific response

20d No X

20e No X

Question 21

Windfall Sites

Do you agree with the wording of the suggested policy?

No X

we however agree with criteria a, b, d, f, h, j k and l,. but criterion f should be paramount.

We do not agree with criteria c and e.

Criterion c rules out a site too early in the process.

Criterion e (this would impose a major constraint on site selection. While we recognise that sites with these accessibility attributes are preferable in accordance with normal planning principles, requiring that all sites must satisfy this requirement will rule out sites that meet what we regard as the most important factor - the need to avoid conflict).

Question 22

Transit Sites

Yes X

Question 23

No X

Question 24

B X

Purchase of sites using compulsory powers if necessary

As with any proposed development on a green field site, the uncertainty may cause blight on existing properties near the allocated sites. Allocation should not only be kept to a minimum, but only the most appropriate sites should be selected. Whilst we abhor the use of compulsory purchase, for this purpose, we regard it as the preferable alternative. The alternative approach of allocating 'surplus' sites could result in less acceptable sites being developed merely because the owners of more appropriate sites are not willing to sell.

Question 25

Indicators

No X

*The only indicator should be regarded as the correct measure of policy is
NUMBER OF AUTHORISED PITCHES.*

Part c

Do you want your representation acknowledged?

Yes X -By email

Do you wish to see the report and analysis of comments?

Yes X – By email link to website

Do you wish to be informed of when the final plan is published?

Yes X –By email.