

Date: 24/06/09

Our ref: PL/KW/09/12.17.3

Your ref:

Jacqueline Dodman
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Dear Jacqueline

Gypsies and Travellers Development Plan Document (DPD) – Detailed reply to Theydon Bois Action Group response to the Consultation on Options

The following deals with each of the points raised in the Theydon Bois Action Group letter dated 2nd February 2009. That letter formed part of the Theydon Bois Action Group response to the Consultation on Options. The questionnaires and the multi response forms were received by the Forward Planning team and were processed. However the letter was not dealt with until you contacted the Forward Planning team by telephone to query why there had been no reply.

As a result of your contact with the Forward Planning team and our conversation an email was sent to you dated 22nd April 2009. At the time of our telephone conversation I thought a response to only the last paragraph of the Theydon Bois Action Group letter dated 2nd February 2009 was required. I now understand this was not the case and that you wanted a detailed reply to the whole letter. I apologise for the delay and hope this letter will provide the detailed response you wanted.

Each point is dealt with according to the paragraph number in the Theydon Bois Action Group letter dated 2nd February 2009.

Paragraph 4

Underneath Question 1) the reasons for your answer section provided more space to comment on each objective. It was possible to answer no to Question 1) and provide further explanation for each objective underneath. However with hindsight it may have been better to have asked yes or no for each objective. Your comments have been noted and will be taken into account when designing future questionnaires e.g. for the Core Strategy.



Paragraph 5

There is a tendency, in relation to all types of development, for people to adopt a "not in my back yard" mentality. However the Consultation was on proposed sites and it was important to ask whether people were in favour or against a particular site and their reasons. The Roydon and Nazeing question was made compulsory because of the large number of existing sites in that area and it is a key question in deciding the Strategy that should be adopted. If continued concentration in Roydon and Nazeing is not supported an alternative Strategy of distribution will be required.

Paragraph 6

For Epping Forest District, the East of England Plan required that 49 pitches be provided when the Gypsies and Travellers DPD Consultation on Options started in November 2008. Since that time the East of England Plan Review process has seen Epping Forest District Council argue successfully to have the required provision reduced to 34 pitches. The direction to produce the Gypsies and Travellers DPD was binding and has been unaltered by the change in pitch provision. Therefore Epping Forest District Council began the process with the information available at the time, that 49 pitches would be required in the District. Further drafts of the Gypsies and Travellers DPD will of course take into account the most up to date position.

The Essex GTAA is in its final stages and it is hoped a published report will be available in the Autumn.

Sites in the final adopted version of the Gypsies and Travellers DPD may still not be developed. For this reason contingency sites were included in the future provision to enable the target for Gypsies and Travellers sites in the District to be met. Clearly the identification of proposed Gypsies and Travellers sites has caused concern and even fear amongst the settled community. However the argument for contingency sites is that they reduce the need to have to repeat the process of developing a plan, and hence identify more potential sites, in the not too distant future.

The Gypsies and Travellers DPD should provide sufficient pitches to meet existing need for the Gypsies and Travellers community. The housing shortfall evidenced by the housing waiting list for the District is being dealt with as a separate issue through the Core Strategy DPD. Epping Forest District Council was directed by the Secretary of State to produce the Gypsies and Travellers DPD. Therefore housing in general, and Gypsies and Travellers in particular, are being dealt with by two different plans. The Core Strategy will go through a similar process of identifying strategic sites for housing to meet the targets in the East of England Plan to 2021, and beyond to 2031. Affordable housing provision will be a key part of the Core Strategy.

Paragraph 8

Providing options for the strategy of selecting sites may well result in a "not in my back yard" response. However a strategy is needed and given the direction to produce the Gypsies and Travellers DPD a 'do nothing option' was not possible. Taking this point it is therefore difficult to avoid the "not in my back yard" response if the proposing of Gypsies and Travellers sites is seen as inherently negative.

The other questions raised in Paragraph 8 come back to the points in the final paragraph of the letter and the way in which sites were identified. The mapping exercise was to help identify potential sites that might be suitable. It did not begin with a list of sites that were reduced down to those that appeared in the Consultation on Options document. The proposed sites in the Consultation on Options have come directly from the mapping exercise. As part of the mapping exercise land owned by Epping Forest District Council was considered. It was apparent that such land was either in permanent use or poorly located for development. For these reasons only one potential permanent site is currently owned by Epping Forest District Council.

The Consultation on Options encouraged respondents to suggest further sites because this is standard practice in the preparation of any Development Plan. The mapping exercise was conducted by District Council planning officers using the best available information and knowledge. It is reasonable to expect that others who live locally or developers operating in the District will have information on land, that the District Council planning officers are not aware of, which could result in further potential sites coming forward.

Paragraph 9

Epping Forest District Council followed the site search sequence stated in Circular 1/06 although it raises particular difficulties within the District. There are two points to note.

Firstly there is a high demand for urban brownfield sites as most of the District is covered by Green Belt policy. The high demand significantly increases land values on available urban brownfield sites. Given the high cost of purchasing the land any development has to yield a high return and this is very unlikely to be achieved by Gypsies and Travellers sites.

Secondly the constraints of Epping Forest, the Roding Valley and Green Belt policy make it unlikely that Loughton/Buckhurst Hill can be considered as a location for urban extensions. Therefore opportunities for utilising urban extensions in this area are limited.

The consequence of these two points is that the potential sites come mainly from the last two categories in the site search sequence.

Paragraph 10

Question 8) is suggesting a way to overcome the two points noted above. The proposal is to make it planning policy that the developers of large brownfield sites are required to provide Gypsies and Travellers pitches either on or alternatively off site. The policy would then put the onus on developers to make a significant contribution to the target for Gypsies and Travellers pitches.

Paragraph 11

The principle of Harlow expansion has already been determined by the East of England Plan which is part of the development plan for Epping Forest District. However the various detailed options for development around Harlow are still to be tested. The purpose of the question was to consider the principle of providing Gypsies and Travellers sites as part of the extensions to Harlow. If the Harlow extensions are considered to be suitable in principle for Gypsies and Travellers sites further consultation would take place in future. For a response to the "not in my back yard" question see Paragraph 5 above.

Paragraph 12

As for Question 1) the answer "No" could be given and further explanation provided about individual criteria in the space beneath. Again as for Question 1) this way of asking about the criteria will be reconsidered for future questionnaires.

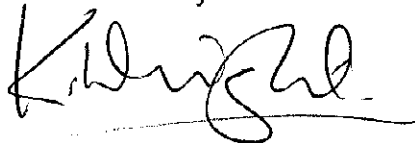
Question 24) offers a choice between contingency sites and compulsory purchase as a means to meet the required target. As a local planning authority Epping Forest District Council have a duty to meet the target as directed by the Secretary of State. As the question states the two options are put forward as a means to ensure the target is met.

Paragraph 13

Consultation on the Sustainability Appraisal is planned for later in the year and will be published and made widely available including to all those who responded to the Consultation on Options. The Consultation on Options document was delivered in time for the beginning of the consultation on 4th November 2008. The number of copies printed was based on previous experience and the experience of local authorities elsewhere who have conducted a similar exercise. When consultation began the demand far exceeded the numbers of copies printed and there was a delay in obtaining more copies. However the deadline for the completion of the Consultation on Options was extended as a result to the 20th of February 2009. This allowed a further two weeks on the consultation period. In total the Consultation on Options lasted for 16 weeks.

If you would like to discuss any of these points further please contact me.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Kevin Wright', written over a horizontal line.

Kevin Wright
Senior Planning Officer