

Theydon Bois Action Group

PROTECTING THE VILLAGE OF THEYDON BOIS

Theydon Bois Action Group
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GO East
Eastbrook
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gtproposedchanges@goeast.gsi.gov.uk

Re: Secretary of State's Proposed Changes to the draft policy on Gypsy and Traveller accommodation in the East of England, her Decisions on the recommendations of the Examination in Public Panel, Sustainability Appraisal and Habitats Regulations Screening Assessment.

Dear Mr Crozier

Theydon Bois Action Group is a fully constituted action group that was set up almost four years ago with the main objective of protecting the Metropolitan Green Belt surrounding the Essex village of Theydon Bois.

The action group researched and compiled the response to the Consultation on Options: Development Plan Provision for Gypsies and Travellers in Epping Forest District, which can be found on our website. This response was endorsed by almost 700 local residents and further endorsed by Theydon Bois Parish Council and Theydon Bois Rural Preservation Society and represents a joint response from Theydon Bois.

TBAG would like to take this opportunity to comment on the Secretary of State's proposed changes to the draft policy on Gypsy and Traveller accommodation, specifically about the pitch number proposed for the Epping Forest District.

We write regarding the above and the directive for Epping Forest District Council (EFDC) to deliver additional Gypsy and Traveller pitches to 2021.

Generally we support EFDC in its assertion that the additional pitch allocation to this district remains too high at 34 by 2011. We append the work that supports this at appendix 1. We understand EFDC have submitted a revised number that will not exceed 20 pitches for delivery by 2011.

We would contend that if a completely fair, practical and deliverable approach were taken, Epping District is already providing above any fairly allocated quota on most modelling done to date for Eastern Region or indeed Essex (see Appendix 1). As this is likely to be rejected by the Secretary of State we are forced to consider our support for no more than 20 pitches.

The headline of this policy is those pitches to be delivered by 2011. To this end on most analyses for the district, no more than 20 pitches can be justified, or indeed are needed. Arguably it is lower than this depending on which 'key' measure is used. On a "demand basis" only 19 additional pitches would be required by 2011 (table 13 Appendix 1). So any number between zero and 20 can be argued. We find ourselves reluctantly supporting EFDC in seeking a number of 20 or less as we believe the public at large, mainly the "settled community", can be persuaded of this.

However, as the wider community now knows this is just the beginning, and EFDC following directives and its own (somewhat flawed) guidelines have proposed future delivery of up to (as currently published) 123 pitches to 2023. This cannot be correct by any measure when compared to expansion in housing stock, population growth, mobility, and in particular the unconstrained land within the district. If contingency is taken out of the equation, on the assumption this can, and will, be delivered from windfall sites becoming available up to 2021, and a more realistic approach to growth in demand from 3% to 1% per annum is used, then the total planned provision to 2021 becomes 31 pitches including the 19 to 2011 (table 13, Appendix 1). This is a number that the settled community will find easier, if still unfair in its application, to accommodate.

A key requirement of the directive is to deliver these pitches quickly, cheaply and with minimum impact on the settled community; "avoid discord and create harmonious relations". If the Secretary of State insists on the original and overly large numbers then this is unlikely to be achieved harmoniously. The experience during the consultation bears this out.

From that part of the district selected for site deployment EFDC has received nearly 10,000 responses to its consultation. On analysis it is likely these are almost unanimously against *any* site delivery, though the skewed and leading questions posed in the consultation document will not allow genuine expression of the public view, this could suggest the resultant DPD to be unsound. Insisting on delivering 34 pitches now and over 100 by 2023 will only mobilise this opposition more vociferously and we urge the Secretary of State to moderate the directive and accept a lower number, as proposed by EFDC, to gain public

support. Local opposition is guided and mobilised by seven residents groups affected directly by the proposals who are taking legal and professional advice. As Theydon Bois Action Group we feel our social responsibility is to support a fair delivery of some pitches as genuinely required, not an over-delivery to remove the burden from other districts; at present on the numbers published we cannot do that. For the reason of delivery, social cohesion and fairness we urge the Secretary of State to support EFDC and thus allow all residents to support its district council in delivering a fairer solution to all, and in particular the settled community.

Lastly, we understand the Secretary of State has already agreed to propose a reduced number of 34 pitches by 2011, "reflecting the particular delivery challenges" in the district. We also point out that this has been done before publication of the Epping Forest District LDP core policies. Whilst this is "allowed" it is not common practice, and by hastily developing and deploying Gypsy and Traveller policy there is a danger this may seriously affect EFDC's ability to deliver its Core Strategy, which should surely take precedence?.

For these reasons we urge the Secretary of State to reduce the 2011 pitch requirement to no more than 20, but also to instruct Go-East to support EFDC in its revised timetable for assessment and consultation.

Yours faithfully

On behalf Theydon Bois Action Group

Cc Eleanor Laing