

Theydon Bois Action Group

PROTECTING THE VILLAGE OF THEYDON BOIS

c/o 32 Theydon Park Road
Theydon Bois
Essex
CM16 7LP

Forward Planning Team
Civic Offices
High Street
Epping
CM16 4BZ

2nd February 2009

Dear Sir/Madam,

Theydon Bois Action Group prepared the response on the Consultation on Options: Development Plan Provision for Gypsies and Travellers in Epping Forest District for Theydon Bois. This response has been endorsed by Theydon Bois Parish Council and Theydon Bois Rural Preservation Society and represents a joint submission to the consultation from our village.

Theydon Bois Action Group would like to take this opportunity to make the following comments with regard to the consultation process.

TBAG, its members and residents experienced problems completing the questionnaire. Many of the questions cannot be answered with a simple 'yes' or 'no' answer.

Question one asks if six possible objectives are agreeable or not. How can this question be answered if some of the objectives are agreeable and some not. Surely no one would disagree with improving the living conditions, health and educational opportunities of Gypsies and Travellers but how can that objective be compared with minimising the need for travel? And why should Epping Forest District be concerned with regional requirements for pitch provision? A question that involves six objectives cannot be answered yes or no.

Many of the questions involve the selection of areas or specific sites. Residents should not be required to answer questions on areas that they have no local knowledge. Why is a question about concentration in Roydon and Nazeing

compulsory? This type of questioning could just result in 'not in my back yard' mentality and pitch parish against parish and landowner against landowner. This will not engender any sort of cohesion and harmony within both the settled community and Gypsy and Traveller communities, which should be paramount in this process.

How can questions regarding the phasing, scale and concentration of sites be considered when there is no explanation of how the East of England Review provision of 49 pitches is explained? Has the Essex GTAA been completed yet? Why is it prudent to include a contingency for sites that have not come forward given that the selection process is so difficult and causes a real fear in communities? Why is it appropriate to plan growth on sites when there is a short fall of 4,000 homes for the local settled community?

It is difficult to answer questions on scale of sites when we have no experience of such an issue. Sites of fewer pitches will necessitate more sites are selected, but smaller sites may be more easily assimilated into the community.

Question six, the second compulsory question is also difficult to answer and will result in 'NIMBY' behaviour. Why have some areas been ruled out before this process has started? Why is there not available a list of sites that were ruled out prior to this consultation process? It has been stated that all potential sites have been highlighted but it now seems that Forward Planning are looking for sites to come forward as part of this consultation process. So which is the case, has the consultant properly considered all potential sites in the District, have all sites that are owned by EFDC been properly considered? Why does it seem that EFDC owned land that may not result in compulsory purchase, has been omitted?

The site search sequence confirms that it minimises the release of rural green field sites in the Green Belt. However sites 20b and 20c are rural green field sites in the green belt but are most 'green' on the site suitability study and 'score well.' This contradicts the site search sequence. Sites 20b and 20c would be most 'red' on this criterion.

Question eight deals with the use of brown field sites - of course they should be considered before sites in the Green Belt. So why is it that all the sites selected as part of this process are Green Belt sites? This question however is still conflicting as Gypsies and Travellers do not wish to live in urban areas and their inclusion into urban communities is more difficult. The urban areas of Loughton seem to have been excluded from the process so how does their exclusion rate with this question when EFDC / the consultants seem to have answered it for us.

How can anyone answer 'yes' to the two parts of question nine when we have been told that the developments at Harlow will be too late for phase one? Are residents not going to be given the opportunity of being consulted for any subsequent phases of this plan? Why is it right or fair that we are being asked to offer our opinion on areas that we do not know and of circumstances that we do not understand? This also will create 'NIMBY' answers, as will any answers to questions 9-20. The only people qualified to answer sites specific questions are

those residents that live within the communities that are affected by the specific proposals.

Question twenty-one requires a 'yes' or 'no' answer to eleven criteria; how can eleven different specific points require one answer? Question twenty-four is again difficult to answer. How can residents choose between having more sites selected than is necessary and compulsory purchase? Both are undemocratic, they may both instil fear in the community and may blight people's environment and homes. Question twenty-five asks about potential indicators of how successful or otherwise the plan is being implemented. Perhaps a more clear and transparent consultation process would have been a better indicator of how successful the plan is?

We also would like to know why tolerated sites were not given Site Suitability Aggregate scores? It was impossible to compare tolerated site scores with new site scores. Why Suitability Appraisals have yet to be written / published? Why the delivery of the consultation documents was so late and therefore the date for completion was not extended appropriately?

We are most concerned why previously excluded sites were suddenly 'mapped' in the final document. There was a subtle change between the Cabinet Draft Consultation document and the eventual Consultation Draft (reference to 21 sites being "excluded" to those 21 sites being "mapped"). Whilst there may be a rational explanation for this it remains a fact that originally 20b and 20c were excluded and the circumstances that justified exclusion remain. These were related to the physical characteristics of the site – access from a "protected lane", within 250m of an informal landfill and within 300m of the M11 motorway. Two clearly relate to the impact of these physical characteristics upon the Gypsies and Travellers who would be occupying these sites. If the sites were considered unacceptable then they should be unacceptable now unless it is now considered acceptable for Gypsies and Travellers to live in such close proximity to the landfill and the motorway.

Yours faithfully,

Jacqueline Dodman
Secretary Theydon Bois Action Group

CC. Di Collins, EFDC
Eleanor Laing MP