

C Sites

8. Sites in the Urban Area

Urban Sites Issues

- No urban sites have been suggested for gypsy and travellers sites as part of the 'Call for Sites' process.
- In the appeal case at Holmsfield Nursery (June 2008) the Secretary of State accepted that a site within the built up area would be unlikely to be suitable because of amenity considerations, or affordable because of values of competing land uses.
- If sites in the urban area are to come forward they are likely to be publicly owned. An exhaustive search has been undertaken of sites on the 'terrier' which is the map of Council owned sites. The Council owns considerable areas in each of the main towns, most of these areas are housing estates and employment areas arising from post-war expansion. No suitable vacant or underused sites were found that are not currently being promoted for affordable housing.
- In terms of industrial areas, the high demand and challenging employment requirements of the East of England Plan mean there are few vacant plots and those that exist are likely to be required for development; although the study setting out revised employment land requirements has yet to be completed for the district.

8.1 The two largest current technically 'previously developed' brownfield sites in the district are both in Epping, at St Margaret's Hospital and St John's School. Both now have outline permission and with no requirement for gypsy/traveller provision. Careful consideration has been given to whether or not Gypsy/traveller provision should be sought here, but because of the advanced stage of both schemes, and because both are 'enabling development' this has been rejected.

8.2 If other large brownfield sites come forward provision might be sought, this could be equivalent to 20% of the site area, for sites of 1 Ha or above. As this would eat into the site area and would reduce the area available for affordable housing; an alternative might be contributions towards off site provision, where a developer secures that site.

Question 8

Large Urban Sites

Should large brownfield sites (1 ha +) in the urban areas outside the Green Belt be required to provide 20% of their land area for travellers pitches?

Yes

No

Should the alternative of off-site provision be allowed even if this were in the green belt?

Yes

No

Please give reasons for your answer

9. Green Belt

Green Belt Issues

- There is a national policy presumption against inappropriate development in the green belt. By definition such development is harmful and is only permissible in 'very special circumstances'. Gypsy and traveller sites are inappropriate in the green belt.
- In planning law, a balancing act then needs to be struck between the harm and benefits of a proposal. Benefits must 'clearly outweigh' any harm. Failure to consider preferable alternatives outside the green belt can weigh against a scheme.
- As well as harm from an inappropriate use it also includes harm to the openness of the green belt and the harm to the character and appearance of the countryside. An appeal in South Cambridgeshire established that the harm of the alternative of displaced unauthorised encampments elsewhere in the green belt must also be considered.
- Benefits would include meeting the needs of the gypsy and traveller community, and the ability of the scheme to meet this need given the shortage of sites.
- The whole of the rural area of Epping Forest District is in the green belt, apart from land within some of the larger villages. But the Holmsfield Nursery appeal decision has concluded that some new pitches in the green belt will be needed because of the shortage of suitable and affordable urban sites.

- In the case of R (Wychavon District Council) v Secretary of State for Communities and Local Government and Others [2008] it was confirmed that loss of a gypsy home without replacement, could in the light of the Convention for the Protection of Human Rights, be 'very special circumstances'. Gypsy/traveller status alone is not sufficient. These circumstances need to be sufficiently unique as to not create a precedent. Inspectors have confirmed at a number of recent development plan inquiries (such as Windsor and Maidenhead) that inability to meet regional targets can be a 'very special circumstance'.

9.1 Circular 1/06 allows for the possibility of sites on the edge of urban areas being removed from the green belt so they can be used as gypsy and traveller sites. Green belt boundaries should be defensible in the long term and where possible follow natural features (PPG2). A single field is unlikely to meet this requirement. Also sites are more likely to find public acceptance when slightly removed from residential areas, one or more fields beyond, although this might not always be possible. Approving a small 'hole' in the green belt at such locations may set an undesirable precedent and raise 'hope' value for other uses, such as housing, only appropriate outside the green belt. For rural allocated sites therefore it may be more appropriate for the green belt to remain and to continue to 'wash over' them.

10. Urban Extensions

10.1 Urban Extensions to Harlow

Harlow Urban Extension Issues

- The East of England Plan requires a strategic review of green belt boundaries around Harlow.
- This proposes major extension to Harlow to the north, but also to some degree in other directions.
- Some of this expansion will be in Epping Forest District, which is working with Harlow and East Herts Districts, and the counties, on coordinating planning for the town's expansion.
- Although the conclusions of work won't be known for a while they could involve extension west of Harlow in the Sumners and/or Katherines area. There is also potential for extension east of Harlow between the town and the M11.
- To the South/South East of Harlow is more constrained, with a clear ridge line forming an important setting for the town.
- Further employment land will also be needed and this will require examination of the potential to extend the Pinnacles employment area, although care would need to be taken to avoid convergence with Roydon.

- Extension will need to extend and incorporate the principles of the Harlow 'Gibberd Masterplan' including extending the town's green network, these areas will be unsuitable for gypsy & traveller sites.

10.2 In each of these cases there is potential to integrate gypsies and travellers sites within the overall scheme, and discussions have been held with consortia promoting such schemes. In addition there may be potential for small scale gypsy and travellers sites on parts of Harlow's fringe unsuitable for major urban extension. As the major centre in the wider region, with good public transport, schools and health facilities it is the most overall sustainable location for gypsies and travellers sites and it may be appropriate that it takes a part of overall provision.

10.3 To the west of Harlow there is the issue of the existing concentration of provision in the Roydon/Nazeing areas. However this need not mean an increase in overall pitches in this area. It could for example involve relocation of caravans from an existing temporary or unauthorised site to a more suitable one.

10.4 These extensions will not come forward in the short term, and so cannot be considered for phase I, although a western extension may come forward first.

10.5 It is felt that the pitch allocation should be for Harlow (as extended), irrespective of district boundaries, as with the housing allocations. This would enable pitches to be located best with regard to existing and proposed services and not arbitrarily according to where district boundaries lie.

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10.6 The proposed phasing is as follows (final distribution may be amended following Harlow options appraisal, as required in East of England Plan):

Phase II 2012-2017	6 pitches West of Harlow with potential for expansion by 3 pitches 2017-2023
Phase III 2018-2023	6 pitches North East of Harlow with land (with potential for expansion by 3 pitches after the Plan period, held as a reserve)
Total Pitches around Harlow (from EFDC allocation) 2012-2023	15

Question 9

Sites as part of Harlow Urban Extensions

Do you agree with these proposals for gypsy/traveller sites to be provided as part of urban extensions to the West of Harlow?

Yes

No

Do you agree with these proposals for gypsy/traveller sites to be provided as part of urban extensions to the North East of Harlow?

Yes

No

Please give reasons for your answer

10.7 Other Potential Urban Extensions

Other Possible Urban Extension Issues

- The regional requirements for housing in the rest of the district have lowered from that initially proposed, as the requirements in the London-Stansted-Cambridge corridor have focussed on Harlow and Hertfordshire.
- The current targets are able to be achieved from current permissions and known sites in the urban area for a number of years. But the district will require 10 years supply from permissions and identified sites which can realistically be delivered from the date of adoption of the Core Strategy (2011). It is very unlikely that currently identified supply will be enough for 10 years supply, so additional sites will be required.
- As a result, and if sufficient previously unidentified sites in the urban area cannot be found, there may or may not be a requirement to expand one or more of the district's towns and/or villages involving a targeted and selective review of the boundary of the green belt. This will be an issue to be explored as part of the Epping Forest Plan Core Strategy Options consultation which is to follow in 2009.

10.8 It is most likely that any such urban extension would not be required until the final phases of the local development framework. A requirement of 15 pitches as part of any such extension is considered reasonable as analysis later in the paper shows that a larger figure will conflict with the 'frontloading' of pitch provision in the period up to 2011 and the growth of these sites afterwards. It is also an option for one of these urban extensions to provide an emergency move on site or transit site (see later section). If an urban extension or extensions are not needed, then a future review may mean allocation of extra sites, potentially near the edge of existing towns.

Question 10

Sites as part of other Urban Extensions

Do you agree that one of the urban extensions to the towns in the district that is likely to be required after 2017 should be required to provide a gypsy/travellers site or sites totalling fifteen pitches?

Yes

No

Please give reasons for your answer

11. Existing Sites

11.1 Approved sites

Issues on the Extension of Existing Authorised Sites

- A balance has to be struck between the expansion of existing sites and the creation of new sites.
- Some new households may not want to live alongside existing ones. Some allowance must also be made for mobility of households between different regions.
- Forecast household growth means that households on existing sites will grow by 40% up to 2021. New sites will also see household growth to an extent depending on when they come forward.
- Regard needs to be had to the maximum desirable size of sites once expanded.
- As the government 'Road Ahead' report notes, it is tempting to take the path of least resistance and simply expand existing sites, but because of the to need limit site size it notes *'it is unlikely to be appropriate for the accommodation needs of Gypsies and Travellers to be met solely through site extensions.'* (Chapter 4)
- Larger existing sites tend to be overcrowded with small pitches on sites that are difficult to expand. Smaller existing sites often cater for individuals, often elderly people, not extended families, and hence have less pressure to grow in size. Of the sites with potential for expansion a number have recently been granted permission.

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Figure 8 Little Brook Road Roydon



11.2 The existing site at **Hopgardens**, to the west of Little End, is the only public site in the district with 16 (very small) pitches. It is in a very rural location in the east of the district, remote from services. It is also on an exposed ridge. Because of these factors, and that it is at the upper end of site size in terms of what is desirable, it is recommended that the site is not expanded.

11.3 There are two authorised sites at Long Green to the west of Bumbles Green, a hamlet near Nazeing. One site **Mamelons Farm** has 16 (small) pitches, but the land rises rapidly on its northern flank, so as well as trying to avoid too many pitches, visual considerations prevent enlargement.

11.4 Similar visual considerations apply to the site a short distance to the east at **Carters Mead**; this has 1 pitch on a similarly sized site, but the rest of the site is used for paddocks, which visually screen the site successfully right on the edge of Bumbles Green. Although the site has limited physical scope for expansion,

limited to perhaps an additional 4 pitches, the recent Secretary of State decision on the site opposite, focussing on the encroachment of Bumbles Green into the green belt, means this is unlikely to be found suitable.

11.5 There are two single pitch sites, at **Longmead** and **Victory Orchard** in the east of the district, but because of their discreet nature and remote locations they are not recommended for expansion.

11.6 There are three small sites close to each other in Roydon Hamlet, including **Reeds Farm** and **Downshoppit**, one of which at **Tomary** has recently been granted permission to expand from six to 12 pitches, but because of the concentration of sites in this area and the wider Nazeing area (see earlier section) it is not recommended that these expand. Slightly to the west in Sedge Green Nazeing is a single pitch at **Moss Nursery** but this is also in a designated flood risk area and in the Lee Valley Regional Park.

Figure 9 Existing Authorised Sites

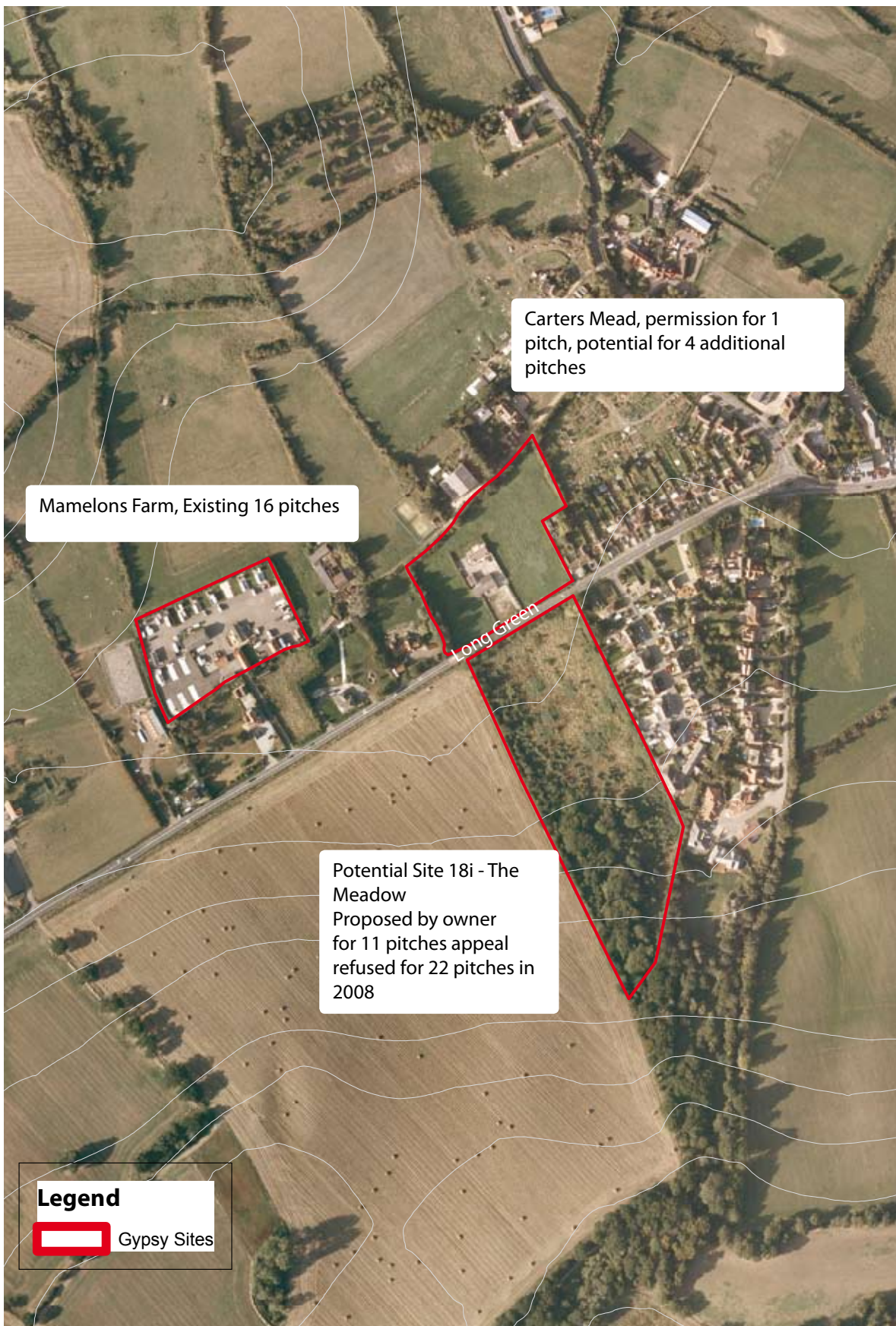
Ref.	Site	Parish	Approved Pitches	Proposal
10a	Little Brook Road, Roydon	Roydon	2	Expansion by up to 4 pitches
11a	Hopgardens, Little End	Stanford Rivers	16	No Extension
11b	Mamelons Farm, Long Green, Bumbles Green	Nazeing	16	No Extension
11c	Longmead, Moreton	Moreton	1	No Extension
11d	Victory Orchard, Berners Roding	Abbess Beauchamp & Berners Roding	1	No Extension
11e	Weald Hall Lane	North Weald Bassett	1	No Extension
11f	Moss Nursery	Nazeing	1	No Extension
11f	Tylers Cross Nursery	Roydon	15 (authorised)	No Extension
11g	Greenleaver	Nazeing	10	No Further Extension
11h	Richards Farm, Hamlet Hill	Roydon	1	No Extension
11i	Downshoppit, Hamlet Hill	Roydon	1	No Extension
11j	Tomary, Hamlet Hill	Roydon	12	No Further Extension

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Figure 10 Hopgardens - Existing Public Site



Figure 11 Sites at Bumbles Green/Long Green



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Figure 12 Exiting Site at Greenleaves - Hoe Lane Nazeing

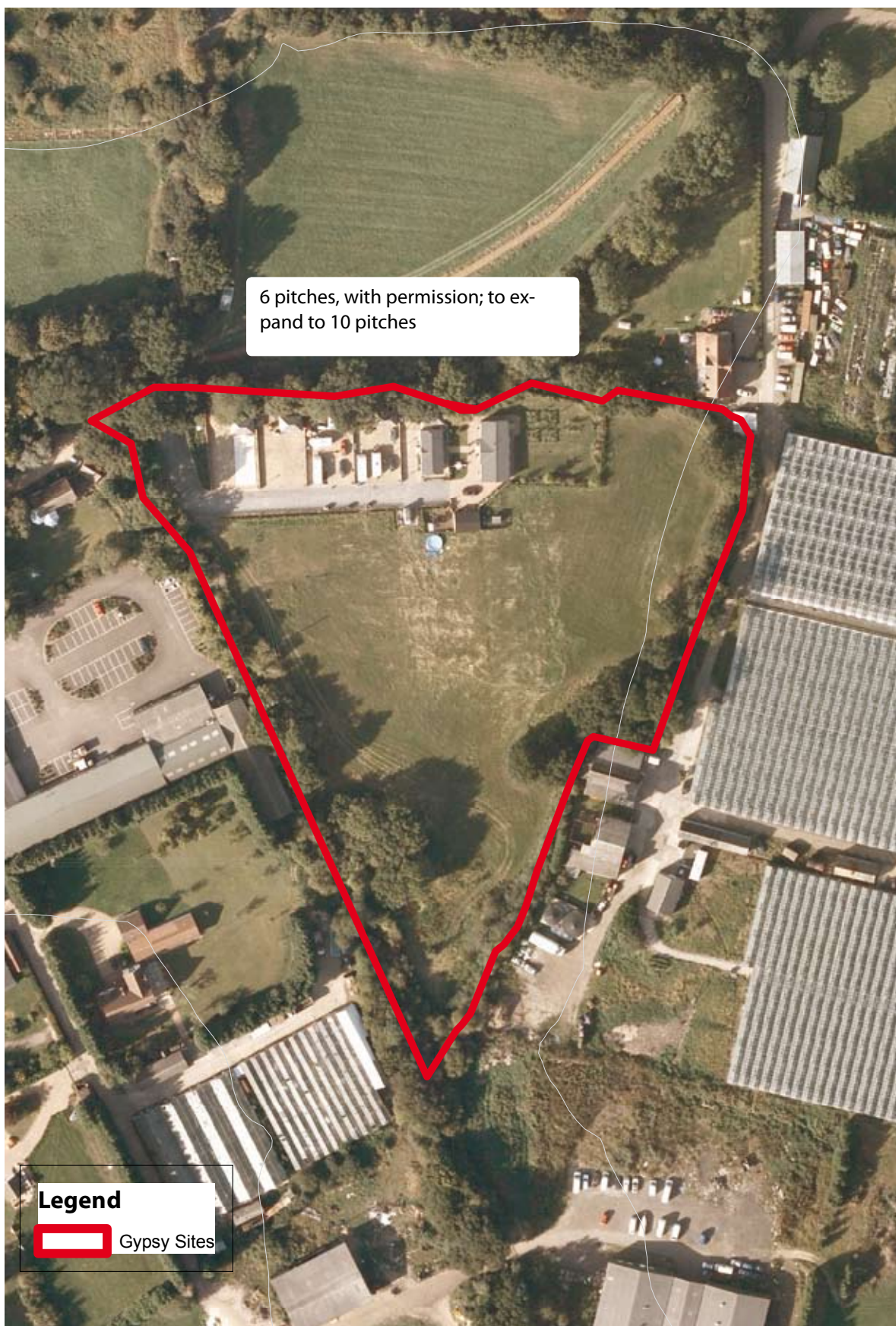
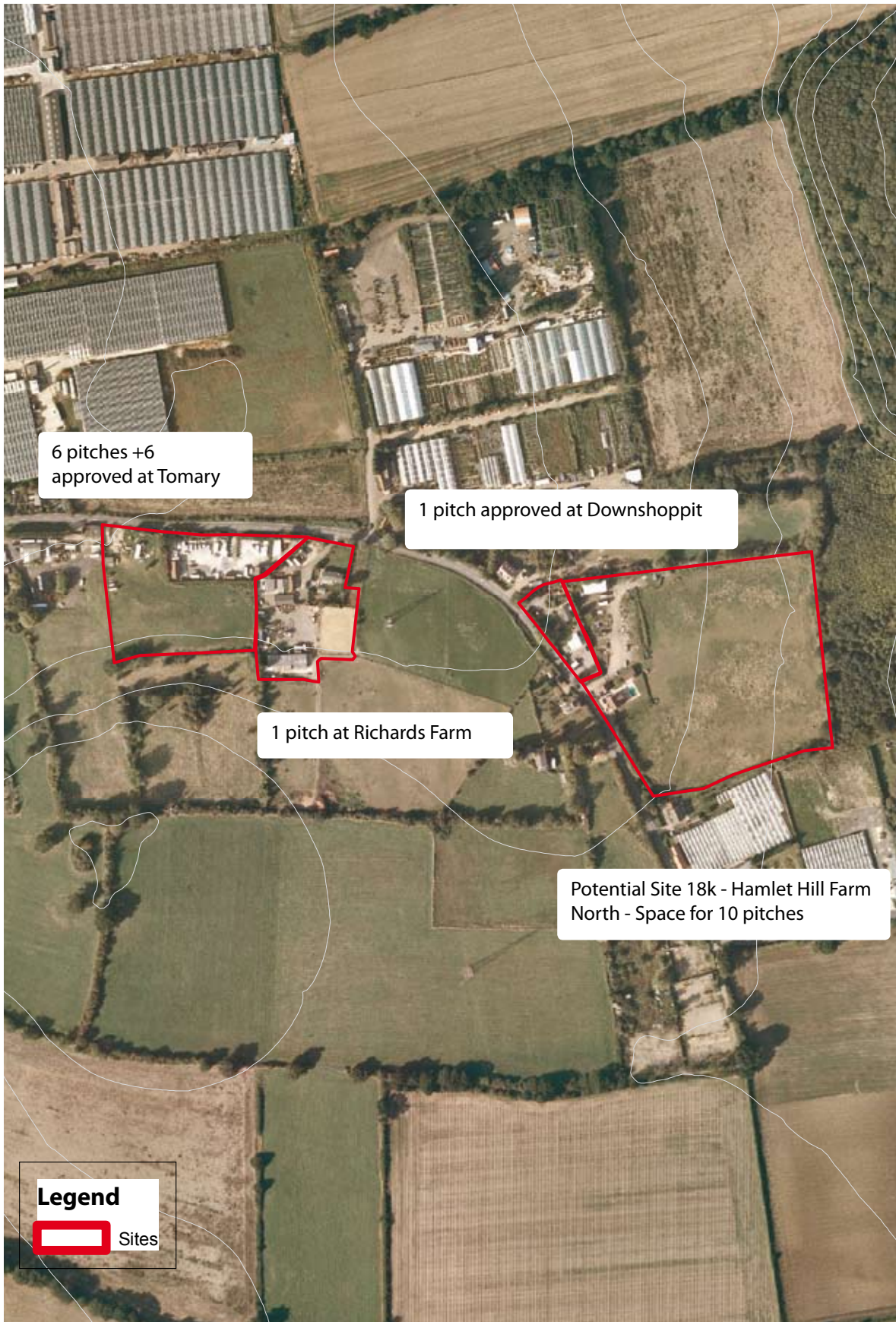


Figure 13 Sites at Hamlet Hill Roydon



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Figure 14 Exiting Site at Tylers Cross Nursery Roydon



11.7 There is another authorised site to the east of Nazeing at [Greenleaver](#) which has six pitches on a site of 2 Ha. The remainder of the site is used as a paddock. Despite the overall concentration of sites in Nazeing this is on balance a good site accessible to services in the village, strongly visually contained by other land uses. For these reasons permission was granted for expansion to 10 pitches in Feb 2008, by increasing the length of the row of pitches on the site's northern edge. Further expansion has been proposed by the owner.

11.8 There is a single pitch on a site on [Weald Hall Lane](#) on the northern edge of North Weald Airfield, but physically it cannot expand. East of Stapleford Abbots there is a two pitch site at [Horsemanside Farm](#) adjoining the Brentwood border, but it is physically constrained and cannot expand within this district.

11.9 At [Tylers Cross Nursery](#) in Roydon, is a site with with 15 authorised pitches. This site has a complex history and has had problems of anti-social behaviour and unauthorised addition of pitches. Because it is at the upper limit in terms of normally desirable site size and because of concentration of pitches in this area it is not recommended for expansion. To the north is the contained single tolerated pitch on [La Rosa Nursery](#).

11.10 There is an authorised site now with two pitches (1 occupied) at the Moores Estate [Little Brook Road](#), to the east of Roydon, it is well concealed. Historically there have been few complaints of antisocial behaviour although complaints have increased recently. It has potential to expand by up to 4 pitches. Historically the site had two additional pitches which have now been abandoned.

11.11 Overall then, the potential for expansion of existing sites with permanent consent is limited, perhaps to around 4 pitches if the above analysis is accepted.

Question 11

Potential for Expansion of Existing Sites

a) Do you agree with the expansion of the site at Little Brook Road Roydon by site by up to 5 pitches.

Yes

No

b) Do you agree with the expansion of the site at Greenleaver Hoe Lane Nazeing by a further 5 pitches.

Yes

No

Please give reasons for your answers

Question 12

Potential for Expansion of Other Existing Authorised Sites

Do you agree with the assessment of the unsuitability for extension of these sites?

Yes

No

Please give reasons for your answers

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11.12 Tolerated Sites

Tolerated Sites Issues

- The district has five tolerated sites
- These are sites where enforcement action has not been pursued or followed through for one reason or another (such as enforcement priorities or family circumstances).
- Because of the rules on limitations of enforcements, it is now not possible to take enforcement action on these sites, or it may not be expedient.
- Because in most cases appeals have been lost, they do not automatically benefit from 'lawful' use rights

11.13 Over the years the District has considered whether to grant permission for some or all of these sites. This has previously been re-

sisted because of the previous appeal decisions and the risk of setting a precedent for sites in the green belt.

11.14 This may have to be reconsidered in the light of Circular 1/2006 which stresses that sufficient sites must be found even in circumstances where there are significant policy constraints.

11.15 A number of these sites do not have significant policy constraints other than that of the green belt. Some have existed for many years without raising significant concerns, are not obtrusive in the landscape nor have amenity problems.

11.16 Given that it is not possible to take enforcement action, and the challenging targets for pitch provision, a pragmatic way forward might be to allocate some of these sites and grant them planning permission.

11.17 The first potential tolerated site is one of one pitch at **Hosanna** Sedge Green Nazeing. This is in a prominent position, close to a concentration of other sites and so making the site permanent is not recommended. Nearby is a single tolerated pitch at **La Rosa Nursery**, but because of the particular concentration of pitches at Hamlet Hill, and poor relationship with the garden centre, making it permanent is not recommended.

Figure 9 Tolerated Sites

Ref.	Site	Parish	Existing Pitches	Proposal
12a	Hosanna, Sedge Green	Nazeing	1	Do not grant permanent permission
12b	La Rosa Nursery, Sedge Green	Nazeing	1	Do not grant permanent permission
12c	Carisbrook Far, Kiln Lane	North Weald Bassett	1	Grant permanent permission
12d	Hoe Lane, Nazeing	Nazeing	1	Grant permanent permission
12e	Dales, Perry Hill	Nazeing	1	Grant permanent permission
13a	Pond View, Bournebridge Lane	Stapleford Abbots	1	Grant permission and potential expansion by up to 4 pitches

Figure 10 Existing tolerated site at Bournebridge Lane Stapleford Abbots and Potential extension



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11.18 Carisbrook Farm Kiln Road North Weald has a single pitch, in a well screened location, fairly close to services. It may now be a good candidate for granting permission.

11.19 At Hoe Lane, Nazeing is a single pitch site, there is no localised concentration of sites in this part of Nazeing, and the site causes no problems. Though in a fairly prominent location the site is partially screened. On balance it might be considered for granting permission. There is also an unobtrusive single pitch site at Dales at Perry Hill Nazeing.

11.20 A final tolerated site is a single pitch site at Pond View, Bournebridge Lane, Stapleford Abbots. The site is well screened and adjoins the village, again on balance it might be considered suitable for granting permission. The site at Bournebridge Lane is also of interest in that the adjoining field has potential for a new site, possibly of around 4 pitches, the access, visibility and amenity issues arising from access need careful examination. The site is accessible to the village and relatively well screened, although Stapleford Abbots itself does not have the accessibility and range of services of other parts of the District, for this reason it would not be a preferred site if other more accessible sites could be found.

Question 13

Tolerated Sites

Do you agree with the assessment that the listed three tolerated sites should be allocated permanently?

Yes

No

Please give reasons for your answer

Question 14

Potential Extension of Tolerated Site- Bournebridge Lane Stapleford Abbots

Should this site be expanded by around 5 pitches?

Yes

No

Please give reasons for your answer

11.21 **Unauthorised Sites**

Unauthorised Sites Issues

- In July 2008 the number of unauthorised and not tolerated caravans in the district was down to nine, on three sites.

11.22 Apart from the unauthorised pitches at Tylers Cross Nursery considered earlier there are now only two other unauthorised sites.

11.23 At Hillmead Nursery, Nazeing Lane there are 2 unauthorised pitches. This location, though close to services, has very poor access down Nazeing Lane which has long been established as unsuitable for travellers sites, following earlier enforcement action.

11.24 At Devoncot Carthagen Estate there are 2 unauthorised pitches. This location, though it is reasonably accessible to services, is in the Lee Valley Regional Park and is in a flood risk area, and such chalet plots have special policies preventing permanent dwellings. As such it could set a precedent which could un-

dermine the planning efforts to restrict permanent dwellings in this area.

11.25 Historic unauthorised sites previously rejected on appeal have not been considered further; these have all been on very unsuitable sites and almost without exception have been on sites poorly located in terms of services, typically just off motorway junctions.

Question 15

Unauthorised Sites

Do you agree that the unauthorised sites listed above are unsuitable?

Yes

No

Please give reasons for your answer

Figure 11 Unauthorised Sites

Ref.	Site	Parish	Unauthorised Pitches	Current Status
14a	Tylers Cross Nursery, Broadly Common	Roydon	5	Unsuitable, enforcement action being pursued
14b	Hillmead Nursery, Nazeing Lane	Nazeing	2	Unsuitable, enforcement action being pursued
14c	Devoncot, Carthagen Estate	Nazeing	2	Unsuitable, enforcement action being pursued

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Figure 12 Site with temporary permission, Holmsfield Nursery, Meadgate Road, Nazeing



11.26 Temporary Permissions

Temporary Permission Issues

- There are eight caravans (on single caravan pitches) on the Holmsfield Nursery site near Nazeing, now with temporary planning permission for five years granted on appeal in June 2008.
- The key issues were that the site was in the green belt, in the Lee Valley Regional Park and in a flood risk area.
- The Secretary of State, agreeing with the Inspector, granted temporary planning permission. However she also agreed with the Inspector that the site should not be granted permanent planning permission.

11.27 Following a site specific flood risk assessment however the Environment Agency dropped its objection. However the Council's drainage engineers did not have an opportunity to comment on the report at the appeal and they dispute its findings, as it did not deal with the loss of flood storage through land levels possibly being raised, the filling in of a watercourse, and the more detailed local information on flood risk available in the emerging Strategic Flood Risk Assessment. The northern part of the site suffers from noise from a nearby minerals site and cannot be developed.

11.28 The inspector concluded '*on balance, I am not persuaded that [need and personal circumstances] clearly outweigh the harm to the openness of the green belt and by reason of inappropriateness and the harm caused to the character and appearance of the area and the landscape and recreational value of the Lee Valley Regional Park, such as to justify the granting of permanent planning permission for the development.*'

11.29 Given this precedent it is not recommended that the site be allocated as a permanent site, rather that it be replaced by a site or sites formed as part of nearby Harlow urban extensions.

11.30 The granting of temporary permission is not a permanent fix. As 'The Road Ahead' report stresses it is important to be wary of granting temporary permissions that will create a bottleneck of provision when they come to an end.

Question 16

Temporary Permission at Holmsfield Nursery Nazeing

Do you agree that the this site should not be given temporary permission beyond five years (or the coming on stream of sites secured through urban extensions to Harlow if these do not come forward within five years)?

Yes

No

Please give reasons for your answer

12. Remaining Requirements for Additional Sites

12.1 Figure 13 shows the potential phasing and distribution of sites on the preferred options set out previously. It implies that the priority requirement is to find between two and six new sites totalling up 35 pitches by 2012.

12.2 What is clear is that expansion of existing sites will be insufficient. There will need to be some new sites granted permission.

12.3 The resultant phasing would be as shown in Fig 13. If previously unconsidered sites come forward and are granted permission, phasing requirements would need to be adjusted accordingly. The same principle would apply if either or both of the two brownfield sites in Epping came forward.

12.4 The phasing assumes existing and new site households will grow by 3%, and limits are set on the size of extended sites.

12.5 Counting the potential sources of supply from previous section we have a possibility of around 27 pitches from urban extensions, 4 pitches from authorisation of some tolerated sites, and 4 pitches from expansion of an authorised site. This totals 35 pitches, however only 9 of these could be provided by 2012.

12.6 So even if as a result of this consultation all of these sites were accepted this would leave a requirement of $110-35=75$ additional pitches on new sites on greenfield or rural brownfield locations. However the shortfall by 2011 would be $34-9=25$ pitches which would require around two to three new sites of between 6-15 pitches in phase I.

Figure 13 Potential Phasing -Overall

Phase I 2008-2011	Phase II 2012-2017	Phase III 2018-2023	Total
Potential authorisation of tolerated sites (if appropriate) - 4 pitches Expansion of existing authorised Site - 4 pitches	Sites in urban extensions/ edge of South/West Harlow - 6 pitches	+Sites in urban extensions/ edge of North East of Harlow - 9 pitches +Extension of phase II South/West Harlow site - 3 pitches	Total South/West of Harlow 9 pitches Total North East of Harlow 6 pitches - with potential for an expansion by 3 pitches beyond plan period.
+Plus new sites (26 pitches - 4 brownfield and 22 Greenfield - capable of expansion up to 10 pitches in phase II and phase III).	+Extension of new phase I sites - 5 pitches +31 pitches from new sites	+Sites on urban extensions around other towns- 12 pitches +5 pitches from expansion of new phase II sites +5 pitches from final expansion of phase I sites	
Total : 34 pitches (as required by RSS)	Total : 42 pitches	Total: 34 pitches	Total 110 pitches - including contingency of 10 pitches in case of non-delivery.

13. Rural Areas

13.1 Rural Exceptions Sites - Affordability of Sites

13.2 Like the general population, gypsies and travellers have varying incomes and some will not be able to afford to buy sites themselves. This may produce a need for policy to aid the provision of 'affordable' gypsies and travellers pitches. This might include sites which are rented from a specialist registered social landlord or sites purchased by such a social landlord and sold or having shared equity with gypsies/travellers.

13.3 A number of sites could be specifically identified for provision of affordable pitches, although this would raise equity issues concerning which sites were identified in this manner and which were not. The new Essex Gypsy and Traveller Accommodation Assessment will provide more information on affordability.

13.4 National policy allows for a 'rural exceptions' policy for gypsies and travellers sites similar to the 'rural exceptions' site policy used for affordable housing. Such sites are typically not identified and occur on sites normally protected from development in the countryside but where there is a pressing need - such as for affordable housing. This is no substitute however for sufficient provision of allocated sites (that is sites identified on the proposals map as part of the approved plan).

13.5 If previously unconsidered sites come forward unexpectedly then there might be a role for a 'rural exceptions' policy, if the site is suitable and it meets an unmet need. Although rural sites are acceptable in principle, according to national policy, it is difficult to see how such a scheme could be an 'exception'. Most sites for gypsies and travellers will be required to be affordable anyway because of income levels and receipt of housing benefit.

13.6 There is an inherent tension in national policy. 'Exception' sites must be restricted in terms of local connections, but Circular 1/2006 states that local occupancy conditions for gypsies and travellers conflict with the national definitions that such persons enjoy a nomadic lifestyle.

13.7 Rural Brownfield Sites

13.8 Within the green belt there are a small number of previously developed 'Brownfield' sites. Although the fact that a site is previously developed in no way makes inappropriate development in the green belt appropriate, if sites in the green belt do have to be considered then it makes sense to consider brownfield sites first.

13.9 The airfield at North Weald Bassett is in full use, and a small area on its northern edge is already a small authorised gypsy/travellers site. Adjoining and to the west of Merlin Way is a significant area of derelict land which used to contain wartime airfield buildings. A small part of this land at Merlin Way's southern end now has permission for housing.

13.10 Part of this land is potentially contaminated, although whether or not this creates a constraint which cannot be overcome will require further investigation.

13.11 East of Merlin Way the land forms a thin green belt buffer between the airfield and North Weald Bassett and this means that release from the green belt would be unwise as it would form an awkward boundary hard to defend in the long-term.

13.12 Because of the poor appearance of the land however, and good access to North Weald Bassett the site may have potential for development of a gypsy/traveller site. Figure 14 shows a potential arrangement whereby a site of 0.6 ha, and capable of accommodating around 4 pitches, could be concealed behind a landscaping strip to improve the appearance of Merlin Way.

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13.13 This still leaves a significant remaining area (3.6 ha). There is the option of using part of this land as an emergency stop-over site with a maximum capacity of around 25-30 pitches, or perhaps in part as a transit site (see later section). The purpose of an emergency site is to aid enforcement of unauthorised sites, in that the police can more easily move travellers on where there is an emergency stopping place used only for a few days or weeks. The Courts are likely to require that there is a detailed consideration of individual circumstances before an eviction, and relocation to an emergency stopping place provides the time and space to do so. Its existence acts as a deterrent and this means that such sites might not actually be used frequently.

13.14 There are at least two other 'major developed' sites in the Green Belt which have been considered and rejected. Firstly the former Ongar Research Centre was discounted, as it is at a remote location in the rural east of the district. Secondly the redundant part of Luxborough Lane Sewage treatment works Chigwell, although reasonably close to the services of Chigwell, part is in a flood risk area, part suffers from M11 noise and part from smell.

Question 17

Rural Brownfield Sites at North Weald - Merlin Way

A) Do you agree that a small permanent travellers site is suitable in this location?

Yes

No

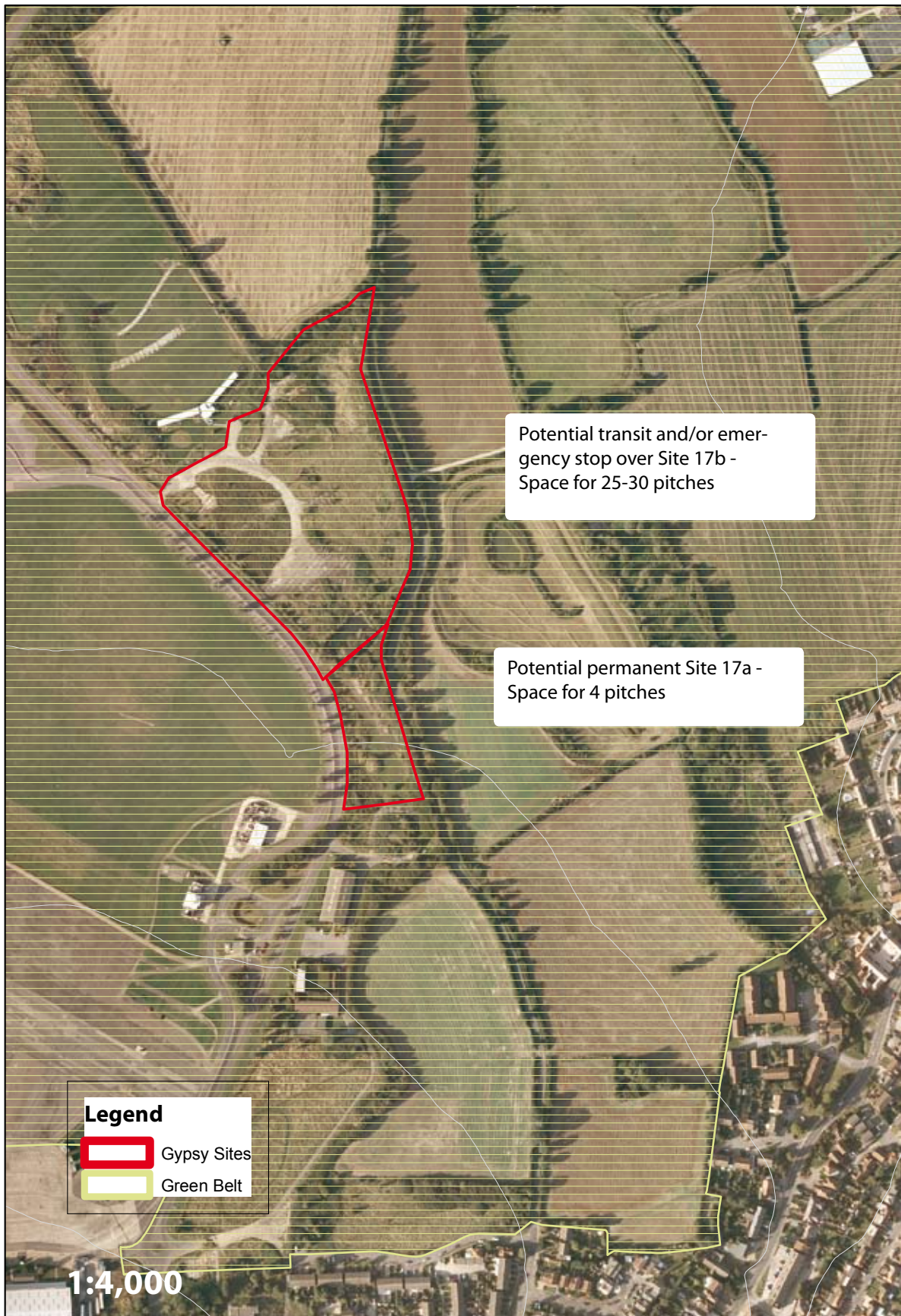
B) Do you agree that this location is suitable for a transit and/or emergency stop over facility ?

Yes

No

Please give reasons for your answers.

Figure 14 Merlin Way North Weald



14. Additional Site Options

14.1 Potential New Sites

14.2 The total number of pitches examined in following sections is around 200, not all of them will prove ultimately acceptable, as the requirement in fig. 13 for new sites (not as part of urban extensions) is 75 pitches. So at least around 40% of the 200 will need to go into the final plan.

14.3 A rigorous search has been undertaken of potential new sites. Within the 'area of search' a further search was undertaken of plots of land that might be of suitable size. Given a normal maximum size of 15 pitches and an assumed site coverage of 60%, this implies a search for plots of land below 2.5 ha. To allow for paddock areas etc. a maximum threshold of 5 Ha has been used to investigate potential sites. Subdivision through separation of small plots of the large arable fields that make up so much of Epping Forest district is undesirable, because irregular field sizes make it difficult to use agricultural machinery. Smaller fields and paddock areas are to be preferred and in general are usually on agricultural land of lesser quality.

14.4 Many of the potential sites are close to each other. In some cases the possible excessive concentration of sites may mean not all potential suitable sites in proximity may be chosen. On the other hand, the fact that many potential sites are inevitably close to each other, given the geography of the district, means that some degree of concentration may be unavoidable.

14.5 So as not to prejudice consideration of options for urban extensions areas as part of the Core Strategy consultation, some areas have been excluded. It is not yet known if these areas will be needed or not, and as stated if they are needed they would come forward too late to be able to meet most of the require-

ment. This means that some areas around Waltham Abbey, Theydon Bois, Chigwell, Harlow and Epping have been excluded. The 'hope value' of these areas could also hinder delivery.

14.6 With this proviso all sites with at least some potential have been included, there is no list of excluded sites.

14.7 Potential Sites around Epping and North Weald Bassett

14.8 Looking firstly at areas around Epping, Epping Green, Thornwood Common and North Weald Bassett.

14.9 One site is an overgrown former allotment area to the west of **Wintry Park** House and in the ownership of the Copped Hall Estate, the site is close to high voltage power lines and an electricity sub station though. This potential site could take around 4 pitches.

14.10 To the east is a paddock next to Wintry Park Farm. This site could take around 6 pitches.

14.11 Close to Epping there is a site to the rear of the Estate Cottages at 137-167 **Lindsey Street**, which includes a disused part of an allotment and a paddock. The site could take around 15 pitches with a small paddock area. The site is under the ownership of the Copped Hall Estate.

14.12 A site lies to the **south west of Epping Green** on a flat area of land. This is an area of paddocks, part of the Copped Hall Estate, which could accommodate a site of 15 pitches with generous paddock areas. This road is a dead end and so a site would not be visible to through traffic, and is very close to the primary school.

14.13 Another site lies to the immediate **east of Epping Green**. This is a disused part of an allotment, this could take 2 pitches. The access would need improvement.

Figure 16 Potential Sites to the North of Epping

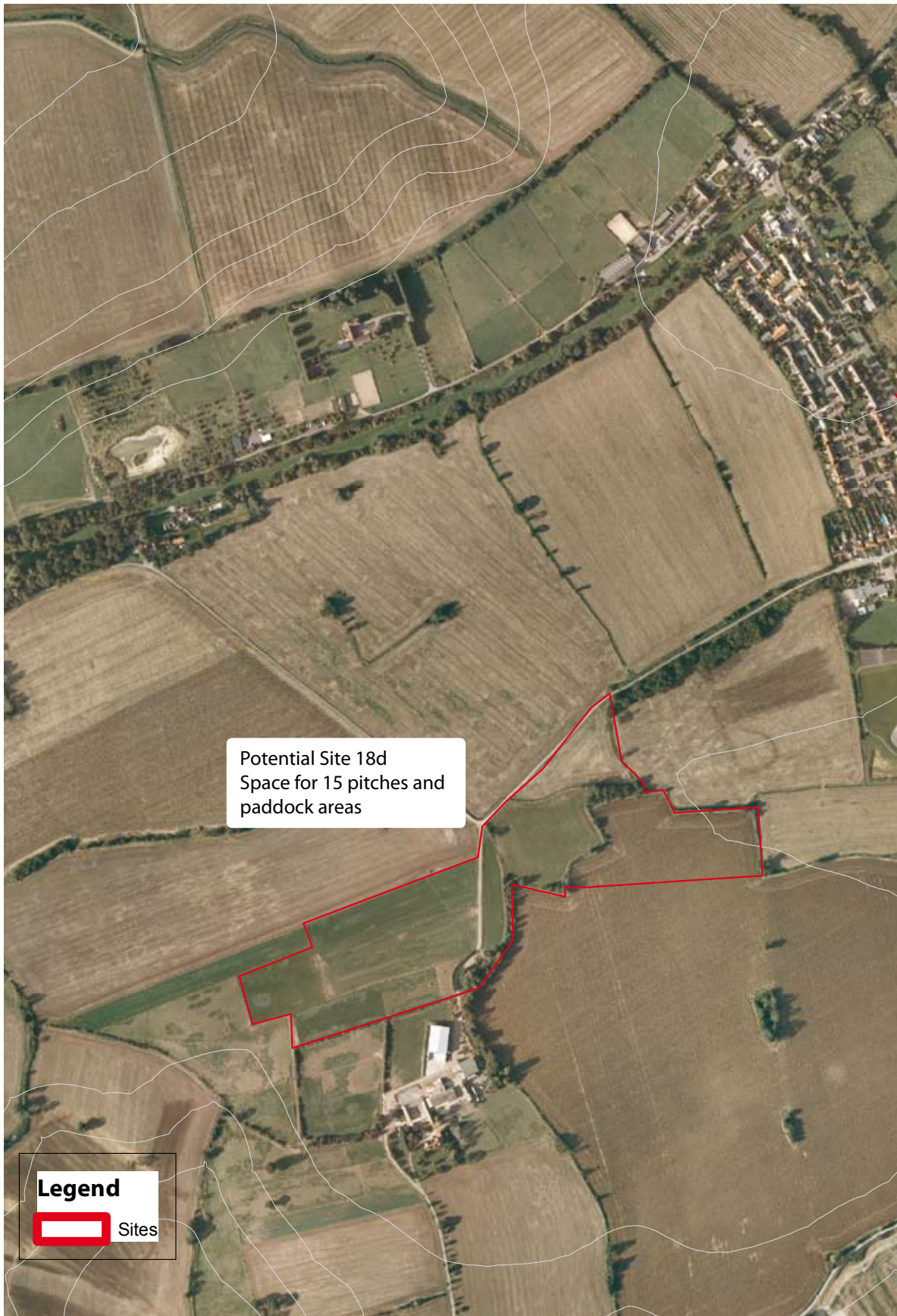


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Figure 17 Potential Site Lindsey Street



Figure 18 Potential Site West of Epping Green



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Figure 19 Potential Site East of Epping Green

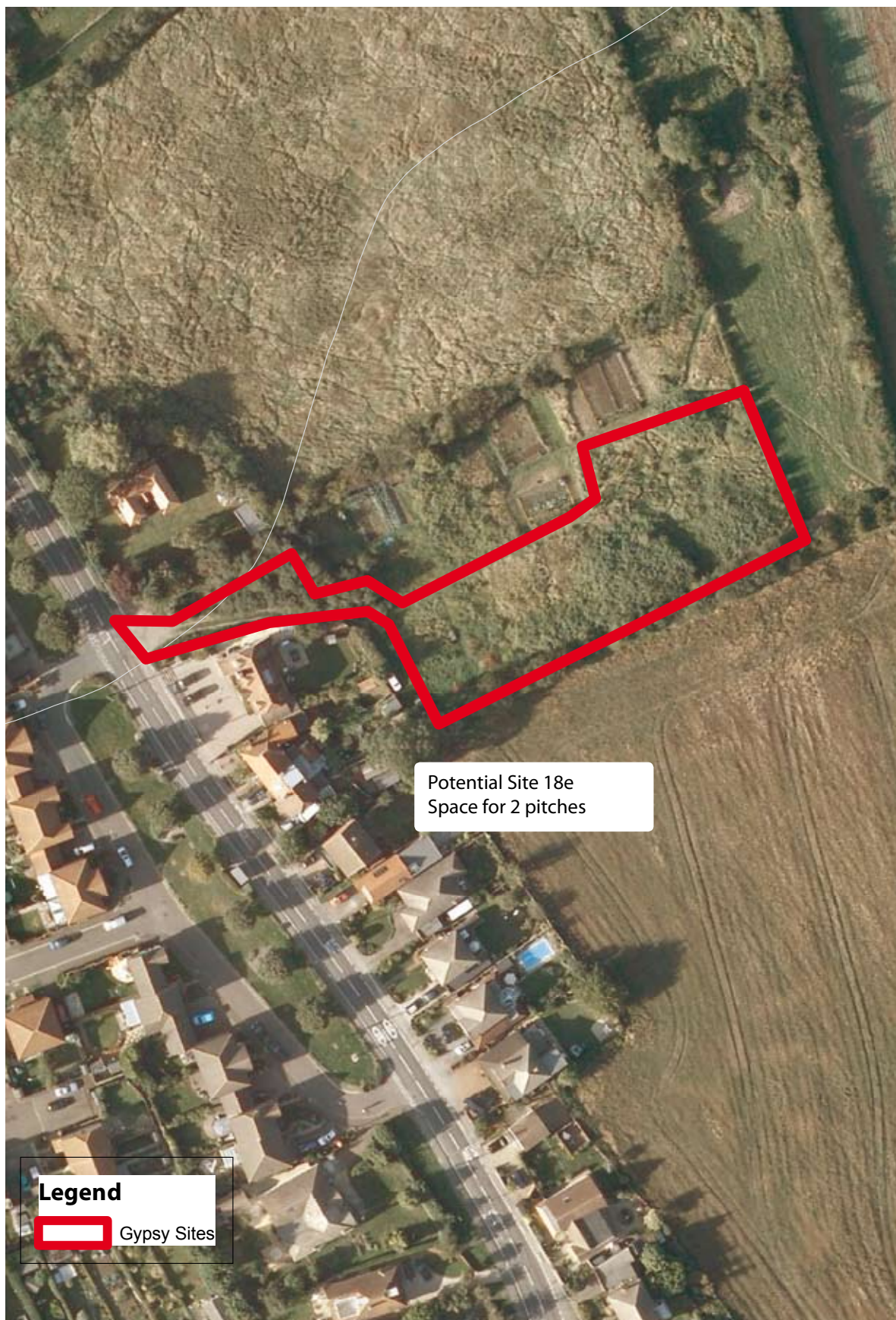


Figure 20 Potential Site East of Thornwood Common - Duck Lane



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Figure 21 Potential Site at Rear of Forest House Woodside - Thornwood Common



Figure 22 Potential Site North of Thornwood Common- Upland Lane



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Figure 23 Potential Site North of Thornwood Common- Rye Hall Road



Figure 24 Potential Site West of Tylers Green, North Weald Bassett



Gypsies and Travellers Development Plan

Consultation on Options

14.14 Turning to around Thornwood Common.

14.15 To the east of the village there is a site directly to the north of Woodside industrial estate and facing **Duck Lane** which might accommodate around 8 pitches. The possible site area excludes an historic moated area. Possible noise from a scrapyard area to the south is an issue.

14.16 Further south on **Woodside Road to the rear of Forest House**, to the rear is a paddock area which could accommodate around 10 pitches.

14.17 To the north of Thornwood Common there is a potential site comprising a paddock area directly to the rear of a petrol station at the **Junction of Thornwood Common Road and Upland Road**, which could take around 8 pitches.

14.18 To the North of Thornwood Common there is a potential site on a paddock area directly to the **rear of Neales Garage** Thornwood Common Road - again this could take around 8 pitches.

14.19 In North Weald Bassett, one area has been looked at earlier in the paper on Merlin Way, there is also a paddock **West of Tylers Green** which could take around 15 pitches.

Figure 15 Potential New Sites - around Epping and North Weald Bassett

Ref.	Site	Parish	Potential Pitches
18a	West of Wintry Park House	Epping	4
18b	East of Wintry Park House	Epping	6
18c	Rear of the Estate Cottages at 137-167 Lindsey Street	Epping	15
18d	West of Epping Green	Epping Upland	15
18e	Disused Allotments, East of Epping Green	Epping Upland	2
18f	Duck Lane Woodside	North Weald Bassett	8
18g	Woodside Road to the rear of Forest House	North Weald Bassett	10
18h	Junction of Thornwood Common Road and Upland Road, Thornwood Common	North Weald Bassett	8
18i	Rear of Neales Garage, Thornwood Common	North Weald Bassett	8
18j	West of Tylers Green North Weald Bassett	North Weald Bassett	8
17a, 17b	East of Merlin Way	North Weald Bassett	4 +potential transit and emergency stop-over provision

Question 18

Potential Sites in the Epping and North Weald Bassett Areas

Please tell us whether or not each of these sites should be taken forward?

Site 18a - Former Allotment -Wintry Park Epping

Yes No

Site 18b - Paddock -Wintry Park Epping

Yes No

Site 18c - Land at Rear of 137-167 Lindsey Street Epping

Yes No

Site 18d - West of Epping Green

Yes No

Site 18e - East of Epping Green

Yes No

Site 18f- Duck Lane Woodside

Yes No

Site 18g- Woodside Road to the rear of Forest House

Yes No

Site 18h - Junction of Thornwood Common Road and Upland Road, Thornwood Common

Yes No

Site 18i -Rear of Neales Garage, Thornwood Common

Yes No

Site 18i - West of Tylers Green North Weald Bassett

Yes No

Please give reasons for your answer

If you know of other sites in this area that are better and/or also should be considered please state which ones and why