

**MORETON, BOBBINGWORTH & THE LAVERS  
PARISH COUNCIL**

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MM Consultation 2021  
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FAO: Planning Policy Team

**RESPONSE TO SUBMISSION VERSION OF THE LOCAL PLAN  
MAIN MODIFICATION CONSULTATION**

On 15<sup>th</sup> July 2021 Epping forest District Council launched its Main Modifications (MM) Consultation for the Submission Version of the Epping Forest District Local Plan to address issues of soundness and/or legal compliance identified by the Inspector. This letter constitutes the response of Moreton, Bobbingworth and the Lavers Parish Council.

**Main Modification 99 (MM99)**

This modification proposes to change numbering of the Travelling Showpeople site as well as amending its definition. Whilst the Council has no concerns regarding the change in numbering, this Council does NOT support the proposed modification to the text for the following reasons:

The original paragraph 5.158 in the Submission Version of the Local Plan set out that 1 yard for travelling showpeople was being allocated as follows:

‘MORE.T1 (Lakeview, Moreton) – 1 yard’

There has been **no evidence provided** to justify why the definition has now been amended to include the wording *‘this site has been identified as suitable for intensification commensurate with on site amenity that allows for children’s play and the appropriate storage for vehicles and machinery.’* Firstly, EFDC’s own evidence base does not support intensification on the site, as follows:

EB402 - (Gypsy, Traveller and Travelling Showpeople Accommodation Assessment Need Summary Report (Final Version) September 2017

- Paragraph 5.32 which reads ‘[...] it was identified during the interview that the yard is **becoming overcrowded** [...]’
- Paragraph 6.3 under the heading ‘Travelling Showpeople’ which reads ‘Whilst the household does not meet the planning definition or have any current or future accommodation needs, the interview did identify that the other 8 plots at the yard were **becoming over-crowded** and that additional plots will be needed to meet the needs of expanding families.’

EB401A - Essex, Southend on Sea and Thurrock Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (ORS, 2017

- Paragraph 1.93 which reads ‘It was only possible to conduct an interview with 1 household that were retired and did not meet the planning definition and had no current or future need. The

interview did identify that the yard is **becoming overcrowded** as families expand and that more plots for Travelling Showpeople are needed in the area.'

Secondly, the proposed additional sentence is itself contradictory. The word 'intensified' in this instance implies increasing capacity on the site, and no evidence has been provided to explain how intensification of the site could possibly 'reduce overcrowding issues'.

Thirdly, this plan is for the period up to 2033. Including policy wording which supports intensification of the site without any maximum capacity limit would leave the site open to intensification for the next 12 years without any limit.

In short, the Council has not provided any supporting evidence to support why the additional wording proposing intensification of the site is justified.

### **Main Modification 113 (MM113)**

This modification proposes to alter the definition of 'Yard'. This Council supports the proposed modification, however feels the Council's description should go further to avoid any ambiguity.

Planning Policy for Traveller sites 2015 identifies under paragraph 9 that 'Local planning authorities should set [...] plot targets for travelling showpeople.' It further states under paragraph 10 that 'Local planning authorities should, in producing their Local Plan [...] relate the number of pitches or plots to the circumstances of the specific size and location of the site and the surrounding population's size and density.' Neither the Submission Version of the Local Plan, nor the proposed main modifications, identify the number of plots proposed for RUR.T6. The proposed modification identifies a plot as being space to accommodate one household estimated at 0.13ha (a plot being suitable for 1 static Caravan and two tourers). Taking into account the space required for internal roads, necessary amenity space including play space for children, storage and maintenance of equipment, and an area for the testing of equipment, the Council should specify the maximum number of plots suitable for this site. This should be completed in conjunction with the current supporting evidence base which identifies there are 9 plots within the Yard, and which also identifies that the site is already overcrowded. In support of this, the Planning Inspectorates decision (Appeal reference APP/J1535/A/1018929) of December 1999 identified that a 'maximum of three caravans per plot would be provide a reasonable ceiling on the capacity of the site whilst allowing more personal space for larger families.'

In summary, the proposed modification remains to ambiguous, and does not provide a control measure in planning terms.

### **Main Modification 212 (MM212)**

This modification proposes to alter the wording associated with RUR.T6. This Council supports the proposed modification to the section under Heritage which requires that consideration should be given to layout, development form, density, height, scale [...] in order to mitigate any impact on the Conservation Area. However this Council does NOT support the proposed new section on Infrastructure, specifically the wording 'intensification of plot'. As specified previously, the site has already been identified as being overcrowded in the Council's own evidence base, and as such is unsuitable for further intensification. This Council proposes alternative wording as follows:

'Development proposals for the site must demonstrate that necessary infrastructure of an appropriate size and quality, to include children play space provision, amenity, storage and testing space, is provided on site.'

The Essex Gypsy and Traveller and Travelling Showpeople Accommodation Assessment dated July 2014 identifies this as the only unauthorised Travelling Showpeople Site in the District. It also identifies that in July 2014 there were in fact only 9 plots consisting of 39 caravans on the site, and identified that in accordance with the typical growth rate for the Traveling Showpeople population (1%-1.5%) a further 2 plots would be needed during the period of the plan. This equates to a 22% increase over the period of the plan. The Parish Council SUPPORTS this evidence, and draws the attention of the inspector to the more than 55% increase currently on the site. This is more than double the identified need within the Council's own evidence.

## **Additional Comments**

The Travelling Showpeople site at Moreton is now so large that it dominates the settlement of Moreton (Annexe 1) – a settlement washed over by the Green Belt.

Annexe 2 clearly evidences that there has been a substantial increase in the number of caravans/mobile homes in a 10 year period. This is corroborated by local residents who noticed a significant increase in activity in 2014 and subsequently raised their concerns directly with EFDC Enforcement. In addition, the concerns of the Parish Council regarding the increase in numbers was also reported to EFDC Enforcement by the Parish Council very early in 2015. The sheer numbers of caravans/mobile homes that have been transported and located at this site in such a short period is evidence that the site is being used more as a Commercial Mobile Home Park than a Travelling Showpeople site.

[... Redacted...]

The Planning Inspectorates decision (Appeal reference APP/J1535/A/1018929) also placed a condition on the site requiring the preparation and implementation of a restoration scheme for the pond ensuring that such restoration provides for the retention and enhancement of its best features of wildlife interest. This condition has never been implemented. The area of the pond is now being used as Plot 15, 15a, 15b & 38 and some area of communal storage.

Furthermore, in 2006 there was a play space provided on the site, however this area is now being used as plot 8b and 3 large sheds. There was also a large area of land to the front of the pond designated for the testing of Showground rides and equipment, however this area is now occupied by Mobile Home 1 with a large area of land around it.

The most recent Planning Application EPF/0499/18, (yet to be decided) submits a site plan as at 19/07/18 detailing and identifying the numbers of Caravans, Mobile Homes and Ancillary Buildings. This identifies a total of 53 Caravans, 9 Mobile Homes, numerous sheds, 2 Site offices, 2 Large workshops and a Container. Therefore in 2018 there were a minimum of 62 forms of housing accommodation on this site as well as numerous Ancillary buildings. Analysis of this data also revealed that Plot 5 was empty as it was away travelling and plots 13, 14, 23, 24, 27 & 28 are not identified in anyway at all. See attached spreadsheet. This in itself corroborates that this site does not need further intensification, and regularising of the site in its current state would already represent overcrowding.

Please accept this letter as the response of this Council.

Yours faithfully

**Mr John Collins**  
**Chairman**  
**Moreton, Bobbingworth and the Lavers Parish Council**

# Annexe 1



# Annexe 2

December 2009



October 2020



# Annexe 3

**Lakeview Mobile Homes & Caravans Application EPF/0499/18**

**Taken from Submitted Drawing of the Site**

<b><u>No</u></b>	<b><u>Mobile Home</u></b>	<b><u>Caravan</u></b>	<b><u>Add Caravan</u></b>	<b><u>Storage</u></b>	<b><u>Total No</u></b>
<b>1</b>	1				
		1	1a		
		1	1b		
		1	1c		
		1	1d		5
<b>2</b>	1				
		1	2a	Container	
	1		2b		3
<b>3</b>		1			1
<b>3a</b>	1				1
<b>4</b>	1				
		1	4a	Shed	2
<b>6</b>	1				
		1	6a		
		1	6b		3
<b>7</b>		1			
		1	7a		
		1	7b		3
<b>8</b>		1		3 x Sheds	
<b>8a</b>	1			shed	
		1	8b		3
<b>9</b>		1			
		1	9a		
		1	9b		
		1	9c		
		1	9d		5
<b>10</b>	1				
		1	10a		
		1	10b		
		1	10c		
		1	10d		
		1	10e		
		1	10f		
		1	10g		8
<b>11</b>	1				1
<b>12</b>		1			
		1	12a		
		1	12b		
		1	12c		
		1	12d		5



15		1			
		1	15a		
		1	15b		3
16		1			1
17		1			1
18		1			1
19		1			1
20		1			1
21		1			1
22		1			1
25		1			1
26		1			1
29		1			1
30		1			1
31		1			1
32		1			1
33		1			1
34		1			1
35		1			1
36		1			1
37		1			1
38		1			1
	9	53	0	0	62

NB Plot 5 is described as away so not included in these Calculations

NB Also missing are details of Caravans, 13,14,23,24,27,28

