

## Appendix 5

# Analysis of main points from “issues and options” consultation, and changes made

### Introduction

The consultation on the “Issues and Options” document closed on 18 June 2007. Respondents could complete questionnaires on-line, through our website, or in printed form. Four one-day exhibitions were held in Broome, Easton, Diss and Wymondham. Consultants have interviewed representatives of the Gypsy and Traveller communities, using a summarised version of the main document.

In addition, the consultants reported on the outcome of four discussion workshops, which were attended by representatives of town and parish councils, local schools and doctors’ practices. The consultants’ report is available on our website: <http://www.south-norfolk.gov.uk/planning/2165.asp>

### The Consultation document and Questionnaire

The “Issues and Options” consultation document began by explaining why we are preparing the DPD, in relation to national planning guidance context, and the new local and regional policy planning system. It outlined the evidence base - including the local needs survey - explained how the DPD will relate to other policy documents, and explained assumptions and definitions, including the implications of continuing to “do nothing”. It set out a suggested vision and objectives for the DPD, identified broad options for site locations (including “do nothing” for comparison), and suggested a “checklist” for selecting specific sites, whichever option is chosen. It also sought views on related issues, including tenure, site design and monitoring.

The questionnaire generally followed this layout of topics. The first twelve questions, and questions 15/16 and 18/19, are arranged as pairs, in the form “do you agree/if not why not?” In each such pair, the first “choice” question allows numeric analysis – the results are set out in the tables below (totals vary because some respondents did not answer all questions). The second question of each pair provided an opportunity for respondents to enter their reasons for disagreeing, and/or their proposed changes, as “free text”. The remaining questions (13, 14, 17 and 20) invited views, again as “free text”, on topics where the document did not put forward any specific proposals.

### Main points of the response to the consultation

In general, the main finding is that those responding generally supported the approach we have taken in the document. A majority of respondents:

- supported the assumptions we made;
- agreed that we have considered all other relevant documents, and fairly summarised the implications for the DPD;
- agreed with our proposed vision and objectives for the DPD;
- agreed to exclude the “do nothing” option, the “sites anywhere” option, and the “sites only next to villages” option;

- agreed with our proposed “checklist” for selecting sites, with some amendments to the weighting to various factors;
- agreed with our list of indicators to be monitored, with some additions.

This shows that we have been generally successful in our aim of helping the public to appreciate the issues involved. The “free text” responses generally made useful suggestions for changes to details, which can be carried forward to the next stage of this DPD.

In terms of “objections”, a significant minority of respondents gave very similar answers to all questions, irrespective of the topic, and several simply answered “no” to choice questions, without giving reasons or suggesting changes. These tended to be those who supported the “do nothing” option, or who felt that provision of sites for Gypsies and Travellers should be subject to stringent pre-conditions.

This minority of respondents also called for more effective enforcement against unauthorised encampments. The “Issues and Options” document attempted to explain the reason that occupiers of unauthorised encampments have been successful in delaying eviction through Court challenges is precisely because the Council currently cannot show that it has met the accommodation needs of Gypsies and Travellers. Once the DPD has been approved, we anticipate that enforcement action will be more effective, as this ground of challenge will no longer be available. It appears that we have not been entirely successful in getting this point across to sections of the public.

One slightly surprising result was the clear majority against the suggestion that housing developers could be asked to contribute to the provision of sites for Gypsies and Travellers, through “planning gain”. We are suggesting that this possibility should be kept “on the table”, but should be progressed through the housing policies of the LDF joint core strategy, not through this DPD.

The document was intended for a number of “audiences”, with different needs. We have to demonstrate that the DPD is “sound”, and complies with the relevant regulations. The former Regulations required us to cover some topics and technical issues which would be mainly of interest to specialist consultees and specific interest groups. In particular, we were required to demonstrate that we had considered all other relevant policies and guidance, and to summarise how they had affected the DPD. To save costs, the summary of other relevant policies (14 pages) was only published on our website. We attempted to explain this, in the document. Not surprisingly, however, several respondents complained that they found this part of the process too technical.

When the issues and Options document was prepared, the Government’s guidance on the design and management of Gypsy and Traveller sites was still awaited. The document could therefore only say that the DPD would comply with this emerging guidance. This may have presented difficulties for some respondents, as there were no specific proposals on which they could comment (especially questions 14 and 17). Nevertheless, some responses included helpful suggestions on these issues. The national guidance has now been issued, and has informed future stages of the DPD.

## Next steps

The task now is to analyse the responses, to provide responses to suggested changes, and to feed the results into the next stage of preparing “Preferred Options”.

The replies to the questionnaire highlight four key policy choices which do not necessarily relate closely to any one question, and which we suggest should be grouped, and given a single response.

To avoid a large amount of repetition, and because the various issues raised by “objectors” are closely linked, I suggest that we also give them a “blanket” response.

This is followed by tables giving the numeric analysis, and suggesting responses to detailed points. If the Steering Group agree with these suggestions, all of those who took part will be informed of the Council’s response to their comments, and how this will inform the next stages of the DPD.

## Key issues

### Key issue 1– “search areas” and broad options for site location

Representations 77, 177, 347, 309, 380, 398. For example:

- Opposed to “search area” corridors – will attract illegal encampments Q8
- Less easy to deal with crime if corridor on County border Q8
- Disagree with putting sites along roads/ in “search areas”
- Too much emphasis on “search areas”
- “Search Areas” may be unduly restraining
- Spread sites evenly through District

A number of those responding to the questionnaire, and Gypsies and Travellers, had concerns that the proposed “search areas” may not provide sufficient sites to meet identified needs. This may be reflected in the majority support for Option A (locations anywhere in the District, except environmentally-sensitive sites – see Question 9). Some Gypsies and Travellers also suggested that past patterns of encampments did not represent free choice. On the other hand, there is the clear evidence of the Needs Survey, and the relative absence of past unauthorised sites in the centre of the District. The “search areas” are deliberately “fuzzy-edged” to avoid unduly restricting a choice of potential locations and to take account of local circumstances such as the local road network connecting to main routes.

**Response:** to adopt Option B, seeking potential sites in the “search areas” but excluding environmentally-sensitive sites, and subject to the “checklist” for detailed site selection.

### **Key issue 2 - size of sites**

Representations 74, 393, Gypsies and Travellers.

The Issues and Options report, quoting the needs survey, proposed four sites of 6-8 pitches each. This is less than half the size of the existing Roundwell site. Several replies to the questionnaire suggested even smaller sites of up to 4 pitches each, to assist community cohesion, following the example of unproblematic sites around Easton. This was supported by Gypsies and Travellers, some of whom had adverse experiences of living on large sites. A small private site of up to 4 pitches might be suitable for an extended family group, but could exclude vulnerable Gypsies and Travellers, and therefore some rented sites will be needed. However, a larger number of locations would be needed to meet the overall need through smaller sites.

**Response:** to consider meeting needs through a mixture of small private sites of approximately 4 pitches, plus some rented sites of 6-8 pitches each, in the “search areas”, but possibly involving more than four sites in total.

### **Key issue 3: Location of sites in relation to settlements**

On the one hand, representations 175, 59, 124, 247, 269, 398, 431:

- Use brownfield sites such as old airfields, well away from communities
- Sites should not adjoin existing dwellings
- Choose sites with least impact on settled communities.

On the other hand, the County Council urges Option E (locate sites close to towns and villages) to comply with policy H.10 of the Structure Plan, the Local Transport Plan, and national guidance to locate development in sustainable locations, in order to minimise the need to travel and reduce reliance on the car. Rural sites could be contrary to policy T.11 of the Structure Plan as it could lead to potentially dangerous traffic movements directly on to “corridors of movement”.

**Response:** Agreed that it is essential to avoid potentially dangerous traffic movements directly on to “corridors of movement”. Otherwise no change. We have attempted to deal with these issues in the “Issues and Options” report. This DPD is part of the LDF and will replace the Norfolk Structure Plan. The current Structure Plan is not itself “sound”, because it does not reflect current Government guidance on Gypsies and Travellers. We have stressed that this DPD should give little weight to the aggregate goal of reducing need to travel/reliance on the car, because of the very small scale of development proposed in this DPD, and the aim of respecting traditional travelling way of life. It is possible to find passages in current advice to support either side of this issue. However, we consider that Circular 1/2006, taken as a whole rather than selective quotation, supports our approach of seeking a realistic balance which recognises the small scale and special features of Gypsy and Traveller sites, and does not uncritically seek to copy aggregate objectives and policies from other forms of development. No other response supported option E.

**Key issue 4: Location of sites in relation to services**

On the one hand, representation 398: too much emphasis on proximity to services. On the other hand, the County Council has commented that remote sites without adequate access to GP surgeries, shops and schools, or public transport, may be contrary to the DPD's aim of improving traveller health and education. Some Gypsies and Travellers felt that the "checklist" should give a higher weighting to the proximity of a site to social and community facilities.

**Response:** No change. There is evidence that provision of permanent sites encourages Gypsies and Travellers to register with GP's and regularly access primary health care, and encourages regular school attendance. There is no clear evidence that this is affected by the distance from health facilities and schools.

**Key "objector" issue:  
DPD is one-sided – insufficient consideration of effect on settled communities**

Representations: 59, 91, 152, 284, 413, 434, 451, 342, 413, 439, 455

**Response:** No change. This DPD is the first substantial attempt in over thirty years to provide sufficient sites for Gypsies and Travellers in the District. The aim is to foster community cohesion by allocating sites that will not disadvantage settled communities.

**Key "objector" issue: better enforcement first**

Representations 88, 90, 96, 454, 69, 222. For example:

- Need improved trespass and eviction laws
- Improved enforcement and evictions of unauthorised encampments
- No faith in Council's ability to deal with Gypsies and Travellers
- Laws should be fairly enforced
- Why monitor numbers of occupiers? – no effective enforcement
- Monitor crime levels, payment of taxes

This issue also featured strongly in the facilitated discussion sessions.

**Response:** No change. Perceptions on this issue may be influenced by one recent unauthorised site in the District, where the occupiers have repeatedly delayed enforcement action through appeals and legal challenges. One of the main current grounds for legal challenge is the lack of provision of Gypsy and Traveller sites, so this pre-condition is in effect a variation of the "do nothing" option. Anyone served with an enforcement notice has the same rights to appeal or mount legal challenges, so the law is being fairly enforced. This DPD cannot change the national enforcement rules. Provision of conventional housing is not conditional on a cessation of unauthorised development by the settled communities, so the suggested pre-condition is not equitable.

**Key “objector” issue: Defer DPD until some other pre-condition is met**

Representations: 308, 309, 346, 347, 69:

- Upholding of all laws – e.g. planning, environmental, highways, taxation
- Give priority to affordable housing
- Liaise with adjoining local authorities – don’t be a pioneer
- First resolve concerns of settled communities

**Response:** No change. There is no clear definition of when each pre-condition would be met, so the effect would be indefinite deferment. It is thus equivalent to the “do nothing” approach, which has been tried - and failed.

**Key “objector” issue: Sites are not needed/unacceptable anywhere**

Representations: 29, 68, 385,

**Response:** Not accepted. The evidence of need is clear. This is another variant of the “do nothing” option.

## Detailed analysis of completed questionnaires, and suggested responses

<b>Question 1</b> – do you agree with our assumptions?	Yes No	32 19
--	-----------	----------

<b>Question: 2</b>	<b>If you do not agree with our assumptions, what should we change?</b>	
<b>Rep. No.</b>	<b>Summary of Representation</b>	<b>Response, and changes made</b>
16	Proposed level of provision may be insufficient	
29, 250, 440	Consider impact of even small sites on local facilities, e.g. schools	We will work with the schools regarding the local impact of any proposed site, in accordance with the agreed Norfolk Strategy for Gypsies and Travellers. We do not accept lack of school capacity as a reason for rejecting a site which is otherwise acceptable.
74, 393	Sites should be even smaller than 6-8 pitches proposed,	Not accepted - larger sites have also proved acceptable
231	Disagree that traffic generation can be disregarded – should be considered, as it is with bricks-and-mortar developments	This is based on a misunderstanding – we said that the scale of traffic generated by Gypsy and Traveller sites is tiny compared to that associated with new fixed housing, so it is not appropriate to seek journey reduction as a goal for this DPD. We will consider local highway access factors in relation to particular sites
231	Environmentally-sensitive sites should be safeguarded, not avoided	Not agreed. The best safeguard is to avoid entirely, which is feasible for this DPD because of the small number of sites required
201	Challenge comparative “accommodation costs” figures – what about council tax?	Retain. The figures are used, in the section on disadvantages faced by Gypsies and Travellers to show that (in some circumstances and including council tax), they pay more for fewer facilities, compared to bricks-and-mortar housing.

South Norfolk Gypsy and Traveller DPD – proposed submission documents

<b>Question 3</b> –have we considered all relevant documents?	Yes	22
	No	13

<b>Question: 4</b>	<b>If not, which should be added?</b>	
<b>Rep. No.</b>	<b>Summary of Representation</b>	<b>Response, and changes made</b>
162, 173, 232, 304	Should include a simple guide - too complex for general public	Not agreed – we consider that we have complied with the relevant regulations
343	No studies of effect on settled communities	We are not aware of any such studies
300	Add: Natural Environment and Rural Communities Act 2006	Agreed (Section 40 – duty to conserve biodiversity)
377	Add: PPS 3 Housing especially para 54 – locations should be available, suitable and achievable	Agreed - this point will be clarified in section on implementation
394	Add: Home Energy Conservation Act 1995 (applies to caravans – duty on local authority to prepare report on how to improve energy efficiency of homes and significantly reduce carbon emissions)	Not agreed – relates to standard of construction of caravans, so any such measures are not relevant to DPD aim of providing sites
420	PPS 25 on Flood Risk has replaced PPG 25	Noted – will be changed
420	If timetable allows, cross-refer to forthcoming Strategic Flood Risk Assessments (especially green infrastructure) and water cycle studies connected to Norwich growth point status.	Unlikely that those studies will be ready in time. DPD aims to avoid flood-risk areas.
317, 420	Refer to growth point status – scale of new housing around Norwich	Agreed
377	May be in conflict with “saved” policies, e.g. Local Plan HOU 23	DPD is part of LDF, which will update and replace Local Plan

South Norfolk Gypsy and Traveller DPD – proposed submission documents

<b>Question 5</b> –have we fairly summarised relevant documents?	Yes No	21 9
--	-----------	---------

<b>Question: 6</b> If not, why not?		
<b>Rep. No.</b>	<b>Summary of Representation</b>	<b>Response, and changes made</b>
163, 174, 233, 305	Too complex for general public	Not agreed – we consider that we have complied with the relevant regulations
421	Need to include summary of PPS 25 on flood risk – suggest sites only in flood “zone 1”	Agreed – will also amend site selection criteria to reflect latest guidance on levels of flood risk
408	Summaries imply preference in favour of providing sites over protection of environment, amenity and resources of settled communities	Not agreed – we consider that the balance is about right

<b>Question 7</b> – do you agree with our Vision for DPD?	Yes No	30 13
---	-----------	----------

<b>Question: 8</b> If you disagree with our vision for the DPD , what alternatives would you suggest?		
<b>Rep. No.</b>	<b>Summary of Representation</b>	<b>Response, and changes made</b>
30, 81	There should be no special rights for Gypsies and Travellers; there should be an objective which acknowledges the needs of the settled communities”	Not agreed – In accordance with the advice in Circular 1/2006, the DPD will aim to “recognise, protect and facilitate the traditional travelling way of life of Gypsies and Travellers, while respecting the rights of settled communities”
164	Choose sites with least impact, not only near main routes	Not agreed – it would be pointless to provide sites in locations unacceptable to the Gypsy and Traveller communities

South Norfolk Gypsy and Traveller DPD – proposed submission documents

379	Need more provision than proposed, to be ready to deal with unexpected demand, as required by Government guidance	We propose that this should be dealt with by monitoring and early review of the DPD
379	Vision should explicitly state aim of “making adequate provision in appropriate locations over 3-5 years, to redress past under-provision”, to accord with current Government guidance	Agreed
410	Doesn’t explain how DPD would assist more effective enforcement, or community cohesion	Agreed – will give a clearer explanation
410	Need and forms of tenure not quantified	Not agreed –needs survey is quantified, and a range of tenures will be considered
422	More emphasis on protecting the natural environment	Agreed – amend objectives to include

<b>Question 9</b> – which option do you prefer?	Option A	30
	Option B	17
	Option C	7
	Other	3
	None	0

<b>Question: 10</b>	<b>do you wish to suggest any other options?</b>	
<b>Rep. No.</b>	<b>Summary of Representation</b>	<b>Response, and changes made</b>
215	Option A, but excluding Waveney Valley	Not accepted –need for one permanent site in “search area” along Waveney valley
380	Local road network is good and should not be a constraint	Not accepted –some locations may have higher risk to highway safety
153	No point in allocating sites unacceptable to travellers	Agreed – this is the reason for using “search areas”
412	Unnecessarily restricting choice of potential locations is equivalent to “do nothing” option C	Agreed

South Norfolk Gypsy and Traveller DPD – proposed submission documents

<b>Question 11</b> –do you agree with the proposed “checklist” for choosing sites?	Yes – Yes, but amend No -	18 11 20
--	---------------------------------	----------------

<b>Question: 12</b>	<b>If you disagree with our “checklist” for selecting sites, do you feel we have omitted important factors, or should they be given different weight?</b>	
<b>Rep. No.</b>	<b>Summary of Representation</b>	<b>Response, and changes made</b>
421	Suggest sites only in flood “zone 1” to comply with PPS 25 (from Q5)	Agreed – amend checklist to reflect current guidance on levels of flood risk
424	Avoid contaminated land – see advice in PPS 23 – not just adverse affect on wellbeing of occupiers - development may mobilise pollutants and increase risks to the environment.	Agreed –reword checklist of factors to avoid. PPS 23 is already included in relevant documents
49, 217, 135, 206, 236, 269, 59, 124, 154, 159, 103, 159, 247	<ul style="list-style-type: none"> <li>• All factors to avoid classed as “desirable” should be “essential”</li> <li>• Some/all “desirable” should be “important”</li> <li>• Add to “essential” – sites must not adjoin existing housing</li> <li>• Drainage should be “essential”</li> <li>• Avoid significant effect on visual and/or residential amenities – move from “desirable” to “essential”</li> </ul>	Not agreed – this would tend to give all factors equal weight and unreasonably restrict choice of sites. Checklist needs allow for possible mitigation of adverse impacts.
145, 381	Waveney Valley is environmentally-sensitive area; para 53 of Circular 1/2006 advises that sites should not be refused because of <u>local</u> landscape or nature conservation designations	Add note to glossary clarifying that, in this DPD, “environmentally sensitive sites” means all <u>sites</u> which have <u>national</u> protection status. There are no <u>areas</u> with this status within the DPD (The Broads National Park lies outside the DPD area)
236	Add to essential factors: “within search areas”	Agreed – this needs to be made clear

South Norfolk Gypsy and Traveller DPD – proposed submission documents

440	Need to balance accessibility to principal road network against visual impact.	Agreed – reword “plus mark” to read: “At highway access point, having regard to limited traffic generation, appropriate layout/visibility can be provided, without significant loss of natural screening”
432	Give greater weight to proximity to services ( to become “essential”), within reasonable walking distance of a bus stop (to become “important”) and landscape issues (to become “important”)	Agreed that weight of proximity to social and community facilities should be increased to “important”, other points not agreed to avoid unreasonably restricting potential sites.

<b>Question: 13</b>	<b>What criteria should we use to identify Transit sites?</b>	
	Many of the responses to the “Issues and Options” consultation make the same points as the draft Government guidance on the design and management of Transit sites which has since been published. To avoid repetition, these representations are not summarised.	
<b>Rep. No.</b>	<b>Summary of Representation</b>	<b>Response, and changes made</b>
	Representations 33, 104, 155, 167, 178, 197, 207, 218, 237,285, 382, 433, 441, 448	Agreed. The DPD will conform with emerging Government guidance on the design and management of sites, and will use the same site selection “checklist” as permanent sites
50, 197, 248, 360, 448	Should be near main roads	Agreed
261	Small transit sites only	Agreed
50,146, 218	At least one mile from any dwelling, as far as possible from dwellings	Not agreed - effect on settled communities is not solely affected by distance – landform/screening and road access must also be considered
92	Provide transit sites as part of permanent sites	This will be considered as an option, but emerging best practice suggests that transit sites raise different design and management issues, and should be kept separate.
23, 448, 457	Near to facilities – shops, health care, schools	This is agreed as a desirable factor, but should not rule out sites which are otherwise acceptable

<b>Question: 14</b>	<b>How should Transit sites be managed?</b>	
	Again, this question has been overtaken by the recent publication of draft Government guidance on the design and management of Transit sites. To avoid repetition, these representations are not summarised, and I suggest a similar response as to question 13	
<b>Representation numbers:</b>	<b>Response, and changes made</b>	
Representations 24, 34, 51, 65, 93, 126, 147, 156, 168, 198, 209, 219, 238, 286, 311, 349, 361, 372, 400, 414, 442, 458	The DPD will conform with emerging Government guidance on the design and management of sites, and will use the same site selection “checklist” as permanent sites	

<b>Question 15</b> - Should housing developers contribute to provision of Gypsy and Traveller sites?	Yes	14
	No	29

<p><b>Question 16:</b> How could this be achieved – or if not, why not?</p> <p>Respondents understood how this could work – several mechanisms were suggested. Gypsies and Travellers were strongly in favour. However, only a minority of other responses supported this possibility, and in one case this support was only for very small sites (one or two pitches) to be provided in this way.</p> <p>Reasons given for objecting included:</p> <ul style="list-style-type: none"> <li>• opposed to “stealth taxes” (239); sites should be financed from pitch rentals (210)</li> <li>• Gypsies and Travellers do not meet the residence qualification for affordable housing (94)</li> <li>• “Planning gain” should finance community facilities (148, 415)</li> <li>• additional burden, could prevent housing sites from coming forward (443)</li> <li>• Impractical given DPD’s short timescale (157).</li> </ul> <p><b>Suggested response:</b> Any policy to implement this suggestion would have to be considered as part of the housing policies of the joint LDF, and the outcome of that process (and location of major housing sites) will not be known for some time. It seems unlikely that developer contributions could assist significantly to meet current needs for new permanent Gypsy and Traveller sites, during the timescale of this DPD (3-5 years). We therefore suggest that this possibility should not be pursued as part of this DPD, but should be considered as part of the preparation of the joint LDF, and monitored.</p>
--

South Norfolk Gypsy and Traveller DPD – proposed submission documents

<b>Question: 17</b>	<b>exploring issues of tenure and affordability</b>	
<b>Rep. No.</b>	<b>Summary of Representation</b>	<b>Response, and changes made</b>
53, 221, 240, 288, 313, 351	Permanent sites should be publicly-owned and managed	Not accepted – conflicts with Government advice - DPD should allow for a variety of tenures. DPD will reflect emerging Government guidance on site management – now published in draft
35, 363	Permanent sites - allow for a variety of tenures	Noted
53	Put limits on number of caravans	Not accepted –DPD explains why the “pitch” is the basic unit of accommodation – full occupation is likely to be temporary, as for bricks-and-mortar housing.
416	Look at register of publicly-owned land	Agreed – part of site selection leading to next stage of DPD
383	Consider compulsory purchase of allocated sites for sale to Gypsies and Travellers, and “land swap” schemes for sites owned by Gypsies and Travellers, but found unacceptable (from Q 15)	Agreed – will be considered as part of section on implementing the DPD.
383	DPD should provide for a range of tenures	Agreed

South Norfolk Gypsy and Traveller DPD – proposed submission documents

<b>Question 18</b> – do you agree with our proposed list of indicators to be monitored?	Yes	26
	Yes, but amend	7
	No	10

<b>Question: 19</b>	<b>If you disagree with our proposed list of indicators to be monitored, what changes would you make? We are particularly interested in views on how to monitor community cohesion.</b>	
<b>Rep. No.</b>	<b>Summary of Representation</b>	<b>Response, and changes made</b>
27	Number of breaches of Human Rights Act	Not accepted – no value as an indicator. The Council complies with the Human Rights Act, which allows planning to limit individual rights, where proportionate and in the public interest. It is expected that the adopted DPD will limit the number of Human Rights challenges to action against unauthorised sites, but this can be adequately measured through the indicators proposed.
55	Number of complaints - from settled or traveller communities	Accepted in principle as a measure of community cohesion
96	Duration of stay on unauthorised sites	Not accepted – purpose of indicator unclear. Some current sites are repeatedly used for short periods.
96	Damage caused by unauthorised encampments	Not accepted –would not add usefully to proposed indicator of number of unauthorised encampments
249	Support proposal for an officer post to promote cohesion and dialogue between traveller communities and settled communities	Will not proceed - bid for Government funding was not successful
290	Gypsy and Traveller accommodation needs - % met	Agreed
129	Measure caravans not pitches	Not accepted. The reasons for using the pitch as the basic unit of accommodation are fully explained in the document.

South Norfolk Gypsy and Traveller DPD – proposed submission documents

241, 384	Ask local parish council to report regularly on cohesion; measure cohesion through level of opposition to proposed sites; seek advice from Commission for Racial Equality (CRE)	We will work with CRE to explore possible indicators of community cohesion that reflect “best practice” nationally.
241	Use health and education records to assess if aims are being achieved	Not accepted –health and education issues are included to explain reasons for national policy to provide Gypsy and Traveller sites, as context for this DPD, and should be monitored nationally.
96, 241	Duration of stay on unauthorised sites, number of complaints about unauthorised encampments, action taken on complaints about unauthorised encampments	Not accepted – we consider the proposed indicator of “incidents of unauthorised encampments” is more informative
450	Crime and disorder records – so local discussions are based on facts, not anecdotes	Not accepted – would only be relevant to the period of preparing the DPD.
417	Proportion of sites which make provision for business use	Not accepted – Government advice clearly indicate that acceptability of business use will depend on site circumstances.
427	Monitor flooding and pollution (waste management) incidents	Not accepted for this DPD – serves a wider purpose. Will be monitored for the whole District

South Norfolk Gypsy and Traveller DPD – proposed submission documents

<b>Question: 20</b>	<b>do you wish to propose targets?</b>	
<b>Rep. No.</b>	<b>Summary of Representation</b>	<b>Response, and changes made</b>
73, 97, 315, 353	Evictions from unauthorised sites in 3 days /one week/28 days	Not accepted. This timescale is not imposed for unauthorised development by settled communities, and is not achievable - occupiers are entitled to test the merits of a site through a planning application, and appeal or legal challenge. Some encampments cause no problems, and are not even reported to the Council. All complaints are investigated and appropriate action taken. We consider that an adopted DPD will assist effective enforcement against unacceptable encampments, as the Council will be able to show that it has made adequate provision, limiting the scope for appeal/legal challenge.
97, 182	No unauthorised sites	Not accepted – not realistic
384	All needs met	Aim to meet <u>identified</u> needs