

## PREVIOUS CONSULTATION (Reg 25)

### Nature of consultation

During the previous stage of the preparation of the DPD, we held an eight week consultation on the Regulation 25 document on a number of shortlisted sites, the criteria we had used to select them, the proposed means of managing the sites and the proposed development management policy. This consultation began on Monday 9<sup>th</sup> March 2009 at 9am and finished on Tuesday 5<sup>th</sup> May 2009 at 4.30pm. The full list of professional bodies is included as Appendix 1. During this time we wrote to everyone who had responded to the previous consultations (both the withdrawn Regulation 27 and previous Issues and Options consultation) and invited them to make comments on the proposals.

We also held drop-in sessions in all the parishes in which sites were proposed. Officers attended each of the exhibitions, and they were able to explain to residents the background to proposals and also the DPD process. They were publicised through postcards mailed to everyone in the relevant parishes (except Wymondham, where a mailing distance of 2km was used) around two weeks before the event. These postcards gave details of the exhibitions and also included information on how the draft document could be viewed. An article in *About Wymondham* magazine was also published including details of the drop-in sessions, along with articles in the local press. Site notices were erected at all the sites advertising the drop-in sessions. We published a Frequently Asked Questions (FAQs) which is attached as Appendix Three. The events took place at the following venues:

Wednesday 18<sup>th</sup> March **Spooner Row Village Hall**

Sessions: 9.30am – 12noon, 2.30pm – 4.30pm & 7.30pm – 9pm

Friday 27<sup>th</sup> March **Earsham Village Hall**

Sessions 9.30am – 12 noon, 2.30pm – 4.30pm & 7.30pm – 9pm

Thursday 2<sup>nd</sup> April **Ketteringham Village Hall**

Sessions 9.30am – 12noon, 2.30pm – 4.30pm & 7.30pm – 9pm

Tuesday 14<sup>th</sup> April **Brockdish Village Hall**

Sessions 9.30am – 12 noon, 2.30pm – 4.30pm & 7.30pm – 9pm

Tuesday 21<sup>st</sup> April **Wymondham Central Hall (Eddie Buttolph Room)**

Sessions 9.30am – 12 noon & 2.30pm - 4.30pm

Wednesday 22<sup>nd</sup> April **Wymondham Central Hall (Eddie Buttolph Room)**

Session 7.30pm – 9pm

A public meeting was also held at Wymondham Central Hall on Wednesday 29 April.

Attendance at each venue was approximately: Spooner Row 98, Earsham 47, Ketteringham 69, Brockdish 158 and Wymondham 46. (These figures are in many cases underestimates as not every member of the public recorded their attendance on the pin chart provided.)

### **Response to consultation**

The consultation resulted generated a significant response. In total, 1591 responses were received during the consultation period; in which 3186 individual comments were made on the draft document. These figures do not include two petitions totalling 732 signatures, although the comments made in the petitions were included in the responses and were not ignored. Many who signed the petition also submitted individual comments. The full list of responses are attached as Appendix 3 however the comments can be summarised as follows:

Many respondents complained that they had to submit new representations to this round of consultation, believing that their registered comments in previous consultations were sufficient. It should be remembered that the previous round of consultation was under Regulation 27 of the development plan regulations. This requires the Council to consider the representations received and decide whether to submit the DPD to the Secretary of State for examination or to return to a previous round of consultation. Cabinet considered the responses to this previous round of consultation at its meeting of 1 December 2008 and, taking account of the points made, Cabinet decided not to submit the document to the Secretary of State for examination but to return to the Regulation 25 stage of the DPD process. In deciding to return to the early stage in the regulations, the Council effectively abandoned that earlier consultation stage and consulted on a new set of criteria and proposals. Under the development plan regulations, the previous Regulation 27 consultation will not be passed to the Inspector when the DPD goes to its examination in public.

General comments – a minority of respondents (less than 100) raised objections to the overall principle of providing sites for Gypsies and Travellers. The majority agreed with the need to provide sites, but disagreed with the site selection, either the methodology itself or the scoring of individual sites.

Many responses questioned the Council's approach to locating sites within the three road corridors. They considered this too restrictive and not based on sound evidence. The 2006 needs survey concluded that sites were required around the A47, in the Waveney Valley area and in the Wymondham to Norwich area. The 2007 Issues and Options consultation suggested that these broad locations should be interpreted as corridors along specified main routes. This document, which was widely circulated at the time to Parish Councils and other statutory consultees, found that this approach was broadly supported and the results of the consultation have been published on the

Council's website. The 'Corridor' approach took into account national planning guidance and the comments of a wide range of consultees. This is consistent with the 2006 Needs Survey. If it were impossible to find sites within the corridors then, by degrees, the search would have been extended, but as can be seen, it has been possible to identify sites. In fact, some sites could be considered to be in two corridors when they are situated near a junction.

Concerns were raised that the selection criteria had not fundamentally changed from the previous round of consultation. In particular, respondents said that in their view, the only criterion that had altered was the one relating to the effect on nearby dwellings. In fact, the scoring mechanism was changed substantially. Greater weight was placed upon 'essential criteria' and any site failing to score highly in this category was discounted regardless of how well it scored on less important factors. This was a major change from the previous consultation process.

Furthermore, the previous consultation had been restricted to seven sites. The current process opened up all 82 sites that had been considered, however briefly, and even if they had been rejected as being unsuitable. In fact, one site at Spinks Lane, Wymondham, which was not one of the sites the Council shortlisted, was 'promoted' by large numbers of respondents from Spooner Row.

This major change resulted in Cabinet deciding to reconvene the Gypsy and Traveller Working Group and re-evaluate sites.

Comments also were received about the lack of a criterion to assess the impact of sites on the community. This factor is covered in the Office of Deputy Prime Minister's (ODPM) circular 01/2006 "Planning for Gypsy and Travellers Caravan Sites".

A number of those who responded thought the selection criteria should have been explained more clearly to clarify why scores were given. Paragraph 5.5 of the draft DPD explains the site evaluation process. While some of the criteria are more subjective, others could usefully have had some commentary explaining the evaluation. Further commentaries on the scoring for the sites proposed to be allocated have been included in the accompanying Proposed Submission Document.

Site size, and particularly the potential for sites to increase in size was a recurring theme in representations. The evidence from the Gypsy and Traveller Accommodation Needs Assessment suggests the optimum size of six to eight pitches. The allocations recommended are for that size and the requirements for screening and landscaping will restrict the ability to extend sites. With regard to accommodating visitors, this is considered to be a factor of site management and not something that the DPD can specifically address.

The comments that the consultation process was too Internet-based are not considered justified. Free paper copies of the consultation document were available at the public exhibitions, public meetings and from the Council

Office. In addition there was a paper version of the questionnaire distributed at the exhibitions. Residents could (and in fact many did) write letters.

To conclude, the public consultation exercise provided the Council with a great deal of evidence that has been invaluable in assessing the suitability of the potential of the sites listed in the Regulation 25 version of the Gypsy and Traveller Development Plan Document. Taking these responses into account has enabled the best sites to go forward for inclusion as allocations in the accompanying submission document.

## Appendix 1

### **List of Consultees**

All town and parish councils and all parish meetings were consulted as part of the above consultation. In addition, the following bodies were also consulted:

We consulted the following Parish Councils adjoining South Norfolk:

Ashby, Herringfleet & Somerleyton Parish Council  
Attleborough Town Council  
Banham Parish Council  
Barnby Parish Council  
Barsham & Shipmeadow Parish Council  
Beccles Town Council  
Belton with Browston Parish Council  
Besthorpe Parish Council  
Blundeston Parish Council  
Brome & Oakley Parish Council  
Brundall Parish Council  
Bungay Town Council  
Burgh Castle Parish Council  
Cantley Parish Council  
Carlton Colville Parish Council  
Drayton Parish Council  
East Tuddenham Parish Council  
Flixton Parish Council  
Freethorpe Parish Council  
Fritton with St Olaves Parish Council  
Great Ellingham Parish Council  
Hardingham Parish Council  
Hellesdon Parish Council  
Homersfield Parish Council  
Honingham Parish Council  
Hoxne Parish Council  
Kenninghall Parish Council  
Little Ellingham Parish Council  
Mattishall Parish Council  
Mendham Parish Council

Mettingham Parish Council  
North Cove Parish Council  
North Lopham Parish Council  
Old Buckenham Parish Council  
Oulton Parish Council  
Palgrave Parish Council  
Postwick with Witton Parish Council  
Ringland Parish Council  
Scoulton Parish Council  
South Elmham Parish Council  
St James South Elmham Parish Meeting  
Reedham Parish Council  
Strumpshaw Parish Council  
Stuston Parish Council  
Thorpe St Andrew Parish Council  
Weybread Parish Council  
Worlingham Parish Council  
Wortham & Burgate Parish Council

We consulted the following business and employment groups:

Chet Valley Business Forum  
Country Land & Business Association  
Diss Business Forum  
East of England Tourist Board  
Ex-Press Plastics  
Federation of Small Businesses  
Group Lotus  
John Innes Centre  
Learning and Skills Council  
National Farmers Union  
Norfolk & Waveney Enterprise Services  
Norfolk Chamber of Commerce  
Norfolk Tourism Team  
Norwich & Norfolk Voluntary Services  
Norwich Research Park  
Royal Norfolk Agricultural Association  
Visit Norwich  
Womens Employment & Enterprise Training Unit (WEETU)  
Wrenbridge (Harts Farm)  
Wymondham Business Forum

We consulted the following environment, heritage and amenity groups:

Broads Society  
Brooke Society  
CABE  
Chet Valley Society  
Community Forum for Wymondham  
Costessey Society

Countryside Agency  
CPRE (Norfolk)  
Cringleford Society  
Diss and District Society  
Diss Environment Group  
Eaton & University Community Forum  
Farming & Wildlife Advisory Group (Norfolk)  
Friends of the Earth  
Friends of the Earth (Norwich Local Group)  
Friends of Tiffey Valley  
Geological Society of Norfolk (GSN)  
Georgian Group  
Hethersett Society  
Hingham Society  
Natural England  
Norfolk Biodiversity Partnership  
Norfolk Wildlife Trust  
Norfolk Windmill Association  
Norwich Fringe Project  
Norwich Society  
Open Spaces Society  
Pulham Market Society  
Ramblers' Association (Norfolk)  
Renewables East  
RSPB (East of England Office)  
Save Harleston Group  
Silfield Partnership  
Surlingham Society  
Tas Valley Society  
The Garden History Society  
Theatres Trust  
Thorpe Abbots Society  
UK Rainwater Harvesting Society  
Upper Waveney Valley Countryside Project  
Wensum Valley CMP  
Woodland Trust  
Wymondham Heritage Society  
Yare Valley Society

We consulted the following health bodies:

Beechcroft Surgery.  
Church Plain Surgery  
Heathgate Surgery Poringland  
Norfolk & Norwich University Hospital NHS Trust  
Norfolk and Waveney Mental Health Partnership  
Old Mill & Millgates Medical Practice  
Parish Fields Practice  
Spire Hospital  
Taverham Surgery

Waveney PCT  
Wymondham Medical Practice

We consulted the following housing associations:

Anglia Housing Group  
Broadland Housing Association  
Cotman Housing Association  
Flagship Housing Group  
Hastoe Housing Association  
Housing Corporation (Central Region)  
Norwich Co-housing Group  
Orbit Housing Association  
Orwell Housing Association  
Saffron Housing Trust  
St Matthews Housing  
Wherry Housing Association

We consulted the following South Norfolk Partnership Organisations:

Chet Valley Development Partnership  
Diss & District Community Partnership  
Diss Tourist Information Centre  
Harleston Development Partnership  
Harleston Tourist Information Point  
Loddon Tourist Information Point  
NCODP South Norfolk Forum  
South Norfolk Alliance  
South Norfolk Older People's Forum  
Wymondham Development Partnership  
Wymondham Tourist Information Centre

We consulted the following Minority Ethnic groups:

East Anglia Charitable Education Trust  
Friends, Family and Travellers  
Gurdwara Shri Guru Ramdas  
Norfolk African Community Association  
Norfolk & Norwich Asian Society  
Norfolk and Norwich Racial Equalities Council  
Norfolk Chinese Community Association  
Norfolk Philippine Support Group  
Norwich Muslim Association  
Reiyukai Centre  
The Gypsy Council

We consulted the following Local Government bodies:

Breckland District Council  
Broadland District Council  
Broads Authority

Great Yarmouth Borough Council  
Mid Suffolk District Council  
Norfolk County Council  
Norfolk Fire Service  
Norfolk Landscape Archaeology  
Norwich City Council  
South Norfolk Councillors  
Suffolk County Council  
Waveney District Council

We consulted the following National & Regional Government bodies:

Defence Estates  
East of England Development Agency  
East of England Regional Assembly  
Equal Opportunities Commission  
GO East  
Health and Safety Executive  
Member of Parliament for Norwich South  
Member of Parliament for South Norfolk  
Office of the Deputy Prime Minister  
Office of Government Commerce/PACE

We consulted the following sports and recreation bodies:

Diss Rugby Club  
National Playing Fields Association  
Norfolk Playing Fields Association  
Sport England (East)  
The Lawn Tennis Association  
Wymondham Tennis Club

We consulted the following transport bodies:

Central Trains  
Civil Aviation Authority  
Inland Waterways Association  
EWS Railways  
First Bus  
National Cycle Network  
Network Rail  
Norwich International Airport  
Office of Rail Regulation  
National Express East Anglia Trains  
National Express East Anglia Railway  
Rail Passenger Council  
Sustrans

We consulted the following Utility providers:

Anglian Water  
EDF Energy  
Mobile Operators Association  
Norfolk Constabulary  
Norfolk Fire Service  
Oil & Pipeline Agency  
Rpyal Mail  
Royal Mail c/o Atisreal

We consulted the following Youth and Education Groups:

All schools in South Norfolk  
Department for Education and Skills  
Easton College  
Norfolk Youth and Community Services  
Standout  
University of East Anglia  
YMCA

We also consulted all agents on our database and a number of housebuilders and developers with an interest in the area. Finally, we also consulted the following bodies:

Campaign for Real Ale  
Camping and Caravan Club  
Diocese of Norwich  
East of England Planning Aid  
EKSS Site Services  
Norfolk Rural Community Council  
The Rural Deans

Appendix 2

## **Gypsy & Traveller Development Plan Document (DPD)**

### **FREQUENTLY ASKED QUESTIONS**

#### **What is the definition of a Traveller?**

“Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family’s or dependants’ housing, educational or health needs or old age have ceased to travel temporarily or permanently, but excluding members of an organised group of travelling show people or circus people traveling together as such.”

**Where do Travellers come from?**

Many of the Gypsies and Travellers we come across in South Norfolk have strong local connections, having lived and travelled round the area often since birth.

**How many Travellers visit or settle in South Norfolk each year?**

We do not know. Many encampments are for a short duration and are not reported to us.

**Why can't Gypsies and Travellers live in houses?**

Many do! 50% of Gypsies currently live in houses.

**Why can't the Council evict Gypsies & Travellers from unauthorised sites?**

72% of caravans are on authorised sites. The Council does take action to move Gypsies and Travellers from unauthorised sites but until the Council has alternative sites for them to go then the actions become very difficult to enforce in Law.

**Why do we have to have permanent sites?**

Every Local Authority has a duty to ensure the housing needs of the authority is met; for Gypsies and Travellers this is providing for caravan sites where they can lawfully station their caravans and mobile homes. We will allocate land for sites using a similar process to that we use to allocate land for housing. The draft Regional Spatial Strategy requires the Council to provide 28 pitches on new permanent sites in the period 2006 – 2011.

**If the Council allocates land for the 28 pitches required in the Regional Spatial Strategy, is this an end to it?**

No – in housing we review the accommodation needs of the district every five years and plan provision to meet the forecasted need. Just as we would expect there will be a need more housing, we would expect a need for more sites.

**Do Gypsies & Travellers pay Council Tax?**

All Gypsy & Travellers who take up residence on a permanent site will pay Council tax. Site pitches are usually rated at Council tax Band A. Site rents are £50 - £60 per week.

**If Gypsies & Travellers are finding sites themselves and applying for planning permission then why do we need these permanent sites as well?**

90% of Planning applications for Gypsy sites are initially refused.

We are currently seeking guidance from the Government's regional office as to whether private Gypsy & Traveller sites getting planning permission can be included in the number of pitches the Council has to provide.

**When will the Harford site be completed?**

The site is due to be completed by September 2009

**How much has the Harford site cost?**

The Harford site has cost in the region of £1.1 million. Costs are higher because the site is remote from existing housing therefore there are significant costs attributed to infra structure and services such as the laying on of water, drainage and electricity. These costs would be lower if the sites were to be positioned closer to existing settlements.

**Who actually scored the sites?**

Officers of the Council evaluated all sites, assessing them against the new criteria set out in the consultation document. Members of the Council's Gypsy and Traveller Working Group visited the sites that were proposed in the previous document. In addition the working group visited three sites that were put forward during the previous consultation. It was the Working Group's assessment that led to the short list of sites to be considered in more detail.

**What happens if the local schools are over subscribed?**

The education authority will allocate children to the next available schools. There is also a Traveller's education service based at Norfolk County Council who provide support to Traveller children and the schools that they attend.