Gypsies and Travellers Local Plan Document

Issues and Options

July 2014

Newly opened transit site, Bawburgh

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Glossary

**Affordable housing**
Housing provided for sale, rent or shared equity at prices in perpetuity below the current market rate, which people in housing need are able to afford.

**Allocated**
Land which has been identified for a specific use in the current Development Plan.

**Appropriate Assessment**
Analysis of the impact of plans and strategies on areas of designated European environmental importance such as Special Protection Areas, Special Areas of Conservation and Ramsar sites.

**Authorised**
Sites with planning permission.

**Biodiversity**
The variety of different types of plant and animal life in a particular region.

**Brownfield land, brownfield site**
See previously developed land.

**Built environment**
The man-made surroundings that provide the setting for human activity, ranging in scale from personal shelter to neighbourhoods to the large-scale civic surroundings.

**Development**
Defined in planning law as ‘the carrying out of building, engineering, mining or other operations in, on, over, or under land, or the making of a material change of use of any building or land’.

**Development Plan**
A set of plans guiding future development in the area. The development plan consists of the adopted Local Plans, neighbourhood plans, and is defined in section 38 of the Planning and Compulsory Purchase Act 2004.

**Development Plan Document**
Locally prepared document on a specific topic which forms part of the development plan and which subject to independent examination before adoption. Also commonly referred to as DPDs.

**Greenfield land (or site)**
Land which has not previously been built on, including land in use for agriculture or forestry. Does not include residential garden land.

**GTAA**
Gypsy and Traveller Accommodation Assessment

**Gypsy and 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’ educational or health needs or old age have ceased to travel temporarily or permanently, but excluding members of an organised group of Travelling Showpeople or circus people travelling together as such.

**Infill development**
Small-scale development filling a gap within an otherwise built up area.
Infrastructure
The network of services to which it is usual for most buildings or activities to be connected. It includes physical services serving the particular development (e.g. gas, electricity and water supply; telephones, sewerage) and also includes networks of roads, public transport routes, footpaths etc as well as community facilities and green infrastructure.

JCS
Joint Core Strategy, the adopted principal Development Plan Document within the Local Plan, which sets the long term strategic vision and spatial strategy for development up to 2026 across the district. All other DPDs have to be in conformity with it.

Key Services
The JCS (paragraph 6.45) identifies these as being: primary school; secondary school; convenience shop; village hall; primary health care; library; public transport.

Local Plan
The plan for the future development of the local area, drawn up by the local planning authority in consultation with the community. In law this is described as the development plan documents adopted under the Planning and Compulsory Purchase Act 2004. Current core strategies or other planning policies, which under the regulations would be considered to be development plan documents, form part of the Local Plan. The term includes old policies which have been saved under the 2004 Act.

Norwich Policy Area
Part of the county which is centred on and strongly influenced by the presence of Norwich as a centre for employment, shopping and entertainment, generally comprising the fringe and first ring of large villages around the city of Norwich, but extending to Long Stratton and Wymondham.

NPPF
National Planning Policy Framework – Published on 27th March 2012 and sets out the Government’s planning policies for England and how these are expected to be applied.

Pitch
Area of a Gypsy/Traveller site where a single household live in their caravans. Pitches may vary between those large enough for one residential trailer (or mobile home) and one touring (small) trailer to those spacious enough to hold one or two large mobile homes and several ‘tourers’ as well as working vehicles. On public (socially provided) sites rented pitches tend to be smaller and are easily delineated by fencing. On private family sites where several related households may own the site it may be less easy to identify separate pitches/plots.

As pitch sizes vary considerably between public (socially provided) and private sites, pitch requirements are described in terms of one pitch per household rather than specifying how many caravans/mobile homes should be accommodated on a pitch. Accordingly, a large household with a number of children may require more than one pitch if living on a public (or private rented) site with limited pitch size.

Plot
Used with reference to Travelling Showpeople sites. A piece of ground large enough to accommodate a single accommodation unit, and may include space for the storage and maintenance of equipment. A group of plots may be referred to as a yard.

PPG
PPfTS
Planning policy for traveller sites, DCLG, 2012. This document sets out the Governments planning policy for traveller sites. It should be read in conjunction with the National Planning Policy Framework.

Previously developed land
Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; and land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time.

Rural exception sites
Small sites used for affordable housing in perpetuity where sites would not normally be used for housing. Rural exception sites seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection. Small numbers of market homes may be allowed at the local authority’s discretion, for example where essential to enable the delivery of affordable units without grant funding.

Settlement Hierarchy
A way of arranging settlements into a hierarchy based upon a number of criteria, such as population and services offered. The JCS sets out the settlement hierarchy for the Greater Norwich area in section 6.2 with more detailed descriptions contained in Policy 9 – 19.

Sustainability Appraisal (SA)
An appraisal of the economic, environmental and social effects of a plan from the outset of the preparation process to allow decisions to be made that accord with sustainable development.

Sustainable development
International and national bodies have set out broad principles of sustainable development. Resolution 42/187 of the United Nations General Assembly defined sustainable development as meeting the needs of the present without compromising the ability of future generations to meet their own needs. The UK Sustainable Development Strategy Securing the Future set out five ‘guiding principles’ of sustainable development: living within the planet’s environmental limits; ensuring a strong, healthy and just society; achieving a sustainable economy; promoting good governance; and using sound science responsibly.

Tolerated
Sites which do not have planning permission, but which have been granted an extended notice period to vacate. This is often in recognition of the lack of alternative sites available.

Transit Site
A site that provides short stage accommodation.

Travelling Showpeople
Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family’s or dependants’ more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily or permanently, but excludes Gypsies and Travellers as defined above.
Travellers
Gypsies and Travellers and Travelling Showpeople as defined above.

Unauthorised development
Unauthorised developments occur on land which is owned by the Gypsies and Travellers or with the approval of the landowner, but for which they do not have planning permission to use for residential purposes.

Unauthorised encampment
Unauthorised encampments occur on land which is not owned by the Gypsies and Travellers, and where the landowner does not approve its occupation.
1. Introduction

What is the Gypsies and Travellers Local Plan?

1.1 The Gypsies and Travellers Local Plan will set out how South Norfolk Council will meet the accommodation needs of the Gypsy and Traveller community and Travelling Showpeople community up to 2031.

1.2 The Council has a legal duty to consider the needs of Gypsies and Travellers in the same way as all other sectors of the community. The Council must plan positively and seek to meet the full objectively assessed needs for market and affordable housing in the housing market area\(^1\), where it is reasonable to do so and consistent with sustainable development\(^2\). Furthermore if the Council does not select and allocate land for additional pitches in accordance with the identified need, it could lead to a number of developments being permitted on a temporary basis, in places that would normally be contrary to normal planning policies. Sites may become established in locations that may not be the most suitable and without a valid plan it may be harder to remove any unauthorised encampments leading heightened local tensions, along with considerable costs in enforcement and appeal proceedings. The plan making process aims to reduce the number of unauthorised developments as well as setting criteria to guide land supply allocations where there is an identified need. The requirement is:

*to address the **likely permanent and transit site accommodation** needs of travellers in the area, working collaboratively with neighbouring local planning authorities.*\(^3\)

1.3 The National Planning Policy Framework (NPPF) states that Local Planning Authorities should set out the strategic priorities for the area of the Local Plan, including the strategic policies to deliver the homes and jobs needed in the area and allocate sites to promote development\(^4\). This includes allocating sites for the objectively assessed needs of Gypsy and Travellers. NPPF paragraph 50 states:

*To deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning authorities should:*

- *plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes);*

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\(^1\) NPPF, DCLG 2012, paragraph 47  
\(^2\) NPPF, DCLG 2012, paragraph 182  
\(^3\) Planning Policy for Traveller Sites DCLG, 2012 paragraph 8  
\(^4\) NPPF 2012, DCLG, paragraph 156-157
• identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand; and

• where they have identified that affordable housing is needed, set policies for meeting this need on site, unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified (for example to improve or make more effective use of the existing housing stock) and the agreed approach contributes to the objective of creating mixed and balanced communities. Such policies should be sufficiently flexible to take account of changing market conditions over time.

1.4 The Council is required to plan for Gypsy and Traveller sites. In producing their plan, Local Planning Authorities are required to:

• identify and update annually, a supply of specific deliverable sites sufficient to provide five years’ worth of sites against their locally set targets
• identify a supply of specific developable sites or broad locations for growth, for years 6 to 10 and where possible for years 11-15
• consider production of joint development plans that set targets on a cross-authority basis, to provide more flexibility in identifying sites, particularly if a local planning authority has special or strict planning constraints across its area (local planning authorities have a duty to cooperate on planning issues that cross administrative boundaries)
• 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
• protect local amenity and environment
• set pitch targets which address the likely permanent and transit site accommodation needs of travellers in their area, working collaboratively with neighboring planning authorities.

1.5 Allocation means in general that the Council can deal more effectively through enforcement of unauthorised encampments and can be more robust in its approach in determining applications for new Gypsy and Traveller sites. In addition New Homes Bonus will be payable to the Council on new sites as will Council Tax.

1.6 In 2011 the Greater Norwich Housing Partnership (of which South Norfolk Council is a partner), commissioned a study to assess the need for additional pitches for at least the next five years. This Gypsy and Traveller Accommodation Assessment (GTAA), included a qualitative review of existing sites and the analysis of population and services across the Greater Norwich area (Norwich, Broadland and South Norfolk Councils) Since the commissioning of the 2011/12 study it is clear that further more robust work is required to comply with the quantitative requirements and assessment of need

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5 Planning Policy for Traveller Sites DCLG, 2012, paragraph 9
6 Planning Policy for Traveller Sites DCLG, 2012, paragraph 8
in order to accord to best practice including the National Planning Policy Framework (NPPF) which was published in 2012 and the recently published Planning Practice Guidance. Since 2012 sites for Gypsies and Travellers have also been granted planning consent and it is likely that needs have changed.

1.7 In March 2014 the Council commissioned a new GTAA covering the whole of the South Norfolk district. The purpose of the GTAA is to have robust up-to-date evidence that complies fully with current guidance so as to inform the emerging Gypsies & Travellers Local Plan.

**The Purpose of the Local Plan Document**

1.8 Local Planning Authorities are required under national guidance to identify a sufficient supply of sites to meet the full objectively assessed needs and set criteria based polices to guide land supply allocations and to provide the basis for decisions in the case of applications. This document seeks your views on the issues and options for the allocation of sites for Gypsies and Travellers. **This consultation will inform the development of an assessment methodology for potential new and existing sites for allocation and invites land to be put forward in order to be considered for allocation.**

1.9 Once the criteria for site selection have been finalised (following the results of this consultation), a further public consultation will take place specifically to look at preferred options for Gypsy and Traveller sites that best meet those identified criteria.

1.10 We are asking a number of questions set around the issues raised in this document and are seeking responses and suggestions for suitable sites. The Interim Sustainability Appraisal Report is also issued for consultation alongside this Issues and Options report. We are inviting comments between 29th August and 24th October 2014.

**How to make a comment and submit potential sites for consideration.**

Please return completed response forms contained in Appendix 3 to:

Planning Policy Manager  
South Norfolk Council,  
Swan Lane,  
Long Stratton,  
Norfolk  
NR15 2XE

Or submit online at  
E mail lp@s-norfolk.gov.uk  On line at http://www.south-norfolk.gov.uk/GTLP

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7 Planning Policy for Traveller Sites DCLG, 2012, paragraph 10
Definitions

1.11 This report uses definitions provided in Annex 1 of Planning Policy for Travellers Sites, 2012 which are duplicated in the glossary.

For simplicity, in this report “Travellers” means “Gypsies and Travellers” and “Travelling Showpeople” as defined.

Timescales

1.12 The Issues and Options consultation marks the next stage of an iterative process that will lead to the Council formally adopting a final version of the document that will allocate specific sites for Gypsies, Travellers and Travelling Showpeople’s use.

The Preparation and Adoption Time Table

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<td>Evidence gathering and drafting of documents</td>
<td>November 2013 – February 2014</td>
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<tr>
<td>Production</td>
<td>Sustainability Appraisal Scoping Report consultation</td>
<td>February 2014 – April 2014</td>
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<td></td>
<td>Consultation on Issues and Options and Interim SA and call for sites</td>
<td>Summer 2014</td>
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<td></td>
<td>Consultation on Preferred Options document and Interim SA. This document will identify all the sites that are considered suitable for Travellers</td>
<td>Winter 2014 / 15</td>
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<td>Publication of the Pre-Submission document and final SA for soundness comments.</td>
<td>Spring 2015</td>
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<td>Winter 2015</td>
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<td>Winter 2015/16</td>
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<td>Spring 2016</td>
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2 Planning Policy and Legislative Context

2.1 Decision making for policy concerning Gypsies and Travellers and Travelling Showpeople sits within a complex legislative and national policy framework. Due regard must be given to relevant Acts and pieces of legislation that apply to Gypsies and Travellers which aim to ensure their needs are taken into consideration in service provision.

- Planning Policy for Traveller Sites 2012;
- National Planning Policy Framework 2012;
- Gypsy and Traveller Accommodation Needs Assessments Guidance, (October 2007)
- Environmental Protection Act 1990 for statutory nuisance provisions;
- The Human Rights Act 1998, when making decisions and welfare assessments;
- The Town and Country Planning Act 1990 (as subsequently amended);
- Criminal Justice and Public Order Act 1994 (sections 61, 62);
- Anti-social behaviour Act 2003 (both as victims and perpetrators of anti-social behaviour);
- Planning and Compulsory Purchase Act 2004;
- Housing Act 2004 which requires local housing authorities to assess the accommodation needs of Gypsies & Travellers and Showpeople as part of their housing needs assessments. The GTAA complies with this;
- Housing Act 1996 in respect of homelessness.

Legislative Framework

2.2 The following is a précis of some of the relevant laws and policies.

Housing Act (2004)

2.3 Section 225 of the Housing Act 2004 (the Act) places a duty on local housing authorities to undertake regular assessments of the accommodation needs of Gypsies and Travellers either living in, or resorting to their area, under the Local Housing Needs Assessment process set out in Section 8 of the Housing Act 1985. The Act also requires local housing authorities to include the needs of Gypsies and Travellers in any housing strategy they produce in line with section 87 of the Local Government Act 2003 and to take any such strategy into account in exercising their functions.
2.4 The definition of Gypsies and Travellers as referred to at Section 225(5)(a) of the Act is that set out for the purposes of planning by the Secretary of State for Communities and Local Government, previously being that set out in Circulars 01/2006 (Gypsies and Travellers) and 04/2007 (Travelling Showpeople). Those Circulars were replaced with the Planning Policy for Traveller Sites in 2012.

**Equality Act (2010)**

2.5 The Act does not define race, however case law has established that Roma Gypsies and Irish Travellers are covered by the protected characteristic of race for the Equality Act 2010. Local authorities have a duty under the Equality Act to actively seek to eliminate unlawful discrimination, advance equality of opportunity and promote good race relations.

**Planning Policy Context**

**National Guidance**

2.6 The Planning Policy for Traveller Sites (DCLG, 2012) should be read alongside the general policies of the NPPF. The guidance places a requirement on local authorities to set pitch targets for Gypsies and Travellers and plot targets for Travelling Showpeople which address the **likely permanent and transit site** accommodation needs of their area. To set those pitch and plot targets local authorities should prepare and maintain an up-to-date understanding of accommodation need using a robust evidence base.

2.7 In addition to setting pitch targets local authorities are required to identify a supply of specific deliverable\(^8\) sites, sufficient to provide five years’ worth of sites against the locally set targets and update annually. There is also a requirement to identify a supply of developable\(^9\) sites or broad locations for growth, for the next 6-10 years and where possible for years 11-15 years\(^10\).

2.8 The Government’s overarching aim is to ensure fair and equal treatment for Travellers, in a way that facilitates the traditional and nomadic way of life of Travellers while respecting the interests of the settled community. To help to achieve this, the Government’s “aims” are\(^11\):

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\(^8\) To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that development will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans. CGL- Planning Policy for Travellers sites page 3

\(^9\) To be considered developable, sites should be in a suitable location for traveller site development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged. – CGL- Planning Policy for Travellers sites page 3

\(^10\) Planning Policy for Traveller Sites DCLG, 2012, paragraph 9

\(^11\) Planning policy for traveller sites, DCLG, 2012, page 1-2
that local planning authorities should make their own assessment of need for the purposes of planning
to ensure that local planning authorities, working collaboratively, develop fair and effective strategies to meet need through the identification of land for sites
to encourage local planning authorities to plan for sites over a reasonable timescale
that plan-making and decision-taking should protect Green Belt from inappropriate development
to promote more private traveller site provision while recognising that there will always be those travellers who cannot provide their own sites
that plan-making and decision-taking should aim to reduce the number of unauthorised developments and encampments and make enforcement more effective
for local planning authorities to ensure that their Local Plan includes fair, realistic and inclusive policies
to increase the number of traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply
to reduce tensions between settled and traveller communities in plan-making and planning decisions
to enable provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure
for local planning authorities to have due regard to the protection of local amenity and local environment.

2.9 The NPPF places emphasis on a presumption in favour of sustainable development.

Section 14 of the NPPF states that for plan-making this means:

- **local planning authorities should positively seek opportunities to meet the development needs of their area;**
- **Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:**
  - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
  - specific policies in this Framework indicate development should be restricted.

For **decision-taking** this means:

- **approving development proposals that accord with the development plan without delay; and**
- **where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:**
any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or

— specific policies in this Framework indicate development should be restricted.

Local Policy


2.11 JCS Policy 4 requires South Norfolk to provide 28 permanent residential pitches between 2006 and 2011 and a further 38 up to 2026, based on the evidence base for the Regional Spatial Strategy.

2.12 In January 2013 the Government revoked the Regional Spatial Strategy for the East of England. The JCS makes the commitment that in light of this, new targets for permanent residential and transit pitches for the period after 2011 should be set based on local evidence.

2.13 In terms of guiding the location of sites and site selection criteria, the JCS states that generally sites will not have more than 10 - 12 pitches, but may be varied to suit the circumstances of a particular site.

2.14 In terms of criteria in assessing applications for sites the policy states that:

“The sites will be provided in locations which have good access to services and in locations where local research demonstrates they would meet the needs of the Gypsy and Traveller communities. Some of the allowance to be provided after 2011 is expected to be provided in association with large-scale strategic housing growth.”

In terms of transit pitches, it stipulates that they will:

“generally be in locations providing good access to the main routes used by Gypsies and Travellers, such as the A11, A47, A140 and A143/A1066.”

The Broads Authority

2.15 The Broads Authority Executive Area partially overlaps South Norfolk. The Broads Authority is the Local Planning Authority in their area, and is responsible for allocating sites. Therefore, the GTLP will not be allocating sites in the Broads Authority Executive Area.
Norfolk and Suffolk Gypsy and Traveller Strategy 2012

2.16 Before August 2011 Norfolk and Suffolk operated independently of each other, each with their own strategies. In 2012 a joint strategy was launched covering six priority areas of need: Accommodation; Community Cohesion; Community Safety; Education; Health and Wellbeing. These priority areas were divided into three themes forming an action plan around Accommodation, Community Cohesion and Education, Health & Wellbeing. In terms of the accommodation the action plan set the aims of identifying suitable land in accordance with the NPPF where need is identified, creating a sustainable and relevant network of transit sites across the counties, each one no larger than 8 – 10 pitches.

Sustainability Appraisal

2.17 As part of the production of the Gypsies and Travellers Local Plan (GTLP), the Council is required to undertake a Sustainability Appraisal (SA). This will assess the likely social, economic and environmental effects of a plan. In doing so, it will aim to promote sustainable development which seeks a better quality of life for everyone, now and in the future. This will ensure the final version of the GTLP is sound and conforms to sustainability principles set out by the Government.

2.18 A Sustainability Appraisal Scoping Report was produced and has been subject to separate consultation (early 2014), in order to set a framework against which the Gypsies & Travellers Local Plan will be assessed. The SA Framework guides the overarching objectives of development of all types across the district. The results of this appraisal will be taken into account in preparing the next stage of the Local Plan.

2.19 South Norfolk Council has a public sector equality duty and it has been determined that this document will require Equalities Impact Assessment (EqIA). The scope of the EqIA has also been subject to consultation along with the SA Scoping Report.

3 The Issues and Options Consultation Stage

3.1 The Gypsies and Travellers Local Plan will address the need (identified in the 2014 GTAA), for further accommodation to be provided for Gypsies and Travellers within South Norfolk in terms of sites and number of pitches through the allocation of sites.

3.2 At this first stage of public consultation, the Council is seeking input and views from the widest range of stakeholders, interest groups and residents on the issues that should be considered and on assessing the options for providing for that identified need. It is important to note that in order to facilitate responses; this document sets out the context for consideration of these issues and options, including national and regional policies and the available evidence base / statistical background. Some of these contextual matters will constrain or direct the way in which the Council moves the
document forward to the ‘Preferred Options’ and ‘Pre Submission’ stages of
the process.

3.3 Set out in this document, there are a number of specific questions which will
help the Council in preparing the ‘Preferred Options’ and the eventual ‘Pre-
Submission Document’, but this is not meant to deter other comments and
views being expressed at this stage. All comments will be taken into account
and considered by the Council.

**Cultural Context**

3.4 A definition of Gypsies and Travellers, and Travelling Showpeople, is given in
paragraph 1.10.

3.5 Gypsies and Travellers have been part of the UK community since at least the
16th Century. Romany Gypsies have lived in Britain for over 600 years and
Irish Travellers also have a long tradition of nomadic life in this country. Gypsy
and Travelling communities have often been marginalised and have lived on
the peripheries of society, without access to mainstream services and with a
shortage of places to stay.

3.6 Reasons for travel are related to work and culture. Despite the tradition of
nomadism, the extent to which Gypsies and Travellers now actively travel
varies greatly across the country. As traditional patterns of work change, so
do patterns of movement, with the majority of Gypsies and Travellers now
leading a more settled life among family and friends, often in caravans.

3.7 The 2012 GTAA, which looked at the qualitative issues, confirmed that the
majority of residents in the Greater Norwich Area and South Norfolk are more
settled. The study reported that 78% of the travelling community respondents
had not travelled in the last 12 months, those that do travel do so for reasons
of holidays and to attend fairs. There is a strong desire for a settled life style
and so that their children can receive education12.

3.8 The tradition of Travelling Showpeople dates back to 1889 when the
Showmen’s Guild was formed. Most Showpeople are members of the guild
and travel around the UK holding fairs. Much of the work is seasonal, and
many showpeople own grounds to pull into over the winter months or travel
from a permanent base to local destinations.

**Caravan Count**

3.9 The most recent bi annual published data, the January 2013 and July 2013
Count of Gypsy and Traveller Caravans showed that in South Norfolk there
were 107 caravans in January 2013 and 100 caravans in July 2013. The
count records the number of caravans on both authorised and unauthorised
sites across the UK. (No count was undertaken of the number of Gypsies and

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12 Greater Norwich Gypsy and Traveller Accommodation Assessment 2012 paragraphs 4.19 – 4.24
Travellers who live in “bricks and mortar” accommodation. It is important to note that the count takes place on a specific day and that unauthorised encampments which happen on other dates will not be recorded. Historical caravan counts are reported in Appendix 2. These counts broadly correlate to the number of caravans counted by officers in May 2014 as part of research into this Issues and Options document and for the GTAA 2014 study. The breakdown is reported in section 3.21.

Table 1 - 2013 Caravan Counts.

<table>
<thead>
<tr>
<th></th>
<th>Authorised sites (with planning permission)</th>
<th>Unauthorised sites (without planning permission)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Public sites</td>
<td>Private Caravans</td>
</tr>
<tr>
<td>No. of Caravans</td>
<td>Temporary Planning Permission</td>
<td>Permanent Planning Permission</td>
</tr>
<tr>
<td>socially rented</td>
<td></td>
<td>All Private Caravans</td>
</tr>
<tr>
<td></td>
<td></td>
<td>No. of Caravans on Sites on Gypsies’ own land</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Tolerated</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Not tolerated</td>
</tr>
<tr>
<td></td>
<td></td>
<td>No. of Caravans on Sites on land not owned by</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Gypsies</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Tolerated</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Not tolerated</td>
</tr>
<tr>
<td>Total All Caravans</td>
<td></td>
<td></td>
</tr>
<tr>
<td>*</td>
<td></td>
<td></td>
</tr>
<tr>
<td>July 2013</td>
<td>36</td>
<td>48</td>
</tr>
<tr>
<td></td>
<td>1</td>
<td>49</td>
</tr>
<tr>
<td></td>
<td></td>
<td>3</td>
</tr>
<tr>
<td></td>
<td></td>
<td>0</td>
</tr>
<tr>
<td></td>
<td></td>
<td>3</td>
</tr>
<tr>
<td></td>
<td></td>
<td>9</td>
</tr>
<tr>
<td></td>
<td></td>
<td>100</td>
</tr>
<tr>
<td>January 2013</td>
<td>35</td>
<td>48</td>
</tr>
<tr>
<td></td>
<td>1</td>
<td>49</td>
</tr>
<tr>
<td></td>
<td></td>
<td>3</td>
</tr>
<tr>
<td></td>
<td></td>
<td>0</td>
</tr>
<tr>
<td></td>
<td></td>
<td>6</td>
</tr>
<tr>
<td></td>
<td></td>
<td>14</td>
</tr>
<tr>
<td></td>
<td></td>
<td>107</td>
</tr>
</tbody>
</table>


* For clarity totals exclude private caravan breakdown between permanent and temporary permission (shaded area)

3.10 The 2012 GTAA carried out by ORS, conducted 63 interviews with the Gypsy and Traveller population, each interview being with a separate pitch or household. This represented approximately 80% of the caravans which were recorded at the time of the July caravan count in 2011 in the Greater Norwich Area. The 2014 South Norfolk GTAA, sought to undertake a full demographic study of all pitches on all private and public sites. The study managed a 99% interview rate at Roundwell Park and 100% at Brooks Green. In terms of private sites and unauthorised developments a slightly lower rate was achieved of approximately 85%.

**Identified Need – Gypsies and Travellers Accommodation Assessment**

3.11 The 2012 GTAA, prepared by consultants ORS, identified that 51 additional pitches would be required in Greater Norwich area in the period to 2016\(^\text{13}\) with a further 30 pitches required every 5 years across the Greater Norwich Area. This was based in part upon the then nationally assumed, Gypsy and Traveller household formation rate of 3%. A requirement for a 6 pitch transit site was also identified in the Greater Norwich Area. Planning permission has since been granted for the provision of a 6 caravan temporary site to satisfy this need at Bawburgh in South Norfolk (permission ref 2013/892). The site opened in late May 2014.

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\(^{13}\) GTAA ORS 2012, Paragraphs 7.26-7.36, page 43
3.12 Since the publication of the 2012 GTAA ORS has undertaken detailed analysis of the long term trends. This work shows the national long term trends are in fact lower and equate to 2.5% per annum on average\(^{14}\). In addition the 2011 Census and ORS’s own national data both indicate a net growth rate of between 1.5% and 2.5% per annum nationally. One of the major components of the 2014 GTAA, also prepared by consultants ORS, was a detailed survey of the Gypsy and Traveller and Travelling Showpeople population in South Norfolk. This aimed to identify current households with housing needs and to assess likely future household formation from within existing households, to help judge the need for any future site provision. It analysed the composition of the local population and identified a local household formation rate based upon this of 2%.

3.13 The government have also since clarified the position on household formation rates stating that:

\[\ldots \text{"the annual growth rate figure of 3% does not represent national planning policy"\ldots } \]

\[\ldots \text{"The previous Administration’s guidance for local authorities on carrying out Gypsy and Traveller Accommodation Assessments under the Housing Act 2004 is unhelpful in that it uses an illustrative example of calculating future accommodation need based on the 3% growth rate figure. The guidance notes that the appropriate rate for individual assessments will depend on the details identified in the local authority’s own assessment of need. As such the Government is not endorsing or supporting the 3% growth rate figure\(^{15}\)\ldots } \]

3.14 In addition the 2014 GTAA utilised a more robust methodology and best practice designed to meet the requirements of the NPPF and Planning Policy for Traveller Sites over the next 15 years. Along with the identification and analysis of the composition of the local population and identification of local household formation rate the study reviewed current need, the supply of current pitch provision, concealed households, current unauthorised developments, temporary planning permissions, migration and conducted a detailed examination of waiting lists. In addition ORS conducted detailed stakeholder engagement including with neighbouring authorities across Norfolk and Suffolk.

Overall the study identified that 35 additional permanent pitches would be required in South Norfolk up to 2031. This is broken down as below:

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>South Norfolk</td>
<td>8</td>
<td>9</td>
<td>13</td>
<td>5</td>
<td>35</td>
</tr>
</tbody>
</table>

\(^{14}\)GTAA ORS 2014 Paragraph 6.24  
\(^{15}\)letter from DCLG to Andrew Selous MP on 26\(^{th}\) March 2014 as reported in the SN GTAA 2014 para 1.14
This permanent requirement includes need arising from unauthorised sites and encampments. The 2014 GTAA concludes that the opening of the new transit site at Bawburgh will satisfy transit provision in South Norfolk and no additional transit provision in South Norfolk is required to 2031.

3.15 South Norfolk contains two authorised permanent public sites at Brooks Green, Keswick and Roundwell Park, Costessey which have a combined capacity for 26 families and 68 caravans. These are both locations close to the administrative boundary with Norwich City. The 2012 GTAA study identified a further 6 authorised private sites, throughout the district. Since then private sites in the District have increased to 12 (including Travelling Showpeoples sites), as identified in the 2014 GTAA.

3.16 The Gypsy and Traveller population across Greater Norwich contains many households who do not travel (78%). This is mainly due to a combination of a desire to settle, for family members to receive education, and the lack of opportunities to travel elsewhere. The 2012 GTAA reported that 48% of respondents stated that they had lived on their current site for more than 5 years; a further 17% had been in residence for 3-5 years, 15%, 1-3 years and 17% less than 6 months. The main reasons for living in the Greater Norwich area were to be near family or because they have historic roots in the area, with 91% of respondents reporting a strong connection to the area.

3.17 The number of applicants on the Council’s waiting list for public pitches in 2012 was 9. These were for sites in South Norfolk (Roundwell (4) and Brooks Green (5))\(^{16}\). It should be noted that as there is currently no public provision in Broadland District. Broadland along with Norwich City Council, do not have a waiting list and that these figures could therefore reflect a wider requirement for pitch provision throughout Greater Norwich and not just South Norfolk. Indeed the 2012 GTAA specifically mentioned in paragraph 3.7 that the majority of respondents identified that they lived in Norwich. This could be taken to mean Greater Norwich as those who answered may not necessarily be aware of administrative boundaries. The 2014 GTAA reported that the waiting list technically stood at zero households. Detailed analysis through the current Housing Register\(^{17}\) for South Norfolk, identifies a total of 13 Gypsy and Traveller Households. However further analysis concluded that only 2 households could be considered in immediate need. As these households currently occupied unauthorised developments the waiting list was reported as zero for the purpose of the calculation so as to avoid any double counting.

**Provision to Date**

3.18 The JCS set South Norfolk Council a target of providing 28 pitches by 2011. Since 2006, 39 pitches have been permitted in South Norfolk, 16 of these since 2011.

\(^{16}\) GTAA 2012, ORS

\(^{17}\) GTAA 2014, ORS paragraph 6.21
3.19 The Transit site for 6 pitches at Bawburgh opened in May 2014. The accommodation it provides is temporary, with travellers allowed to stay for a maximum 12 week stay – the site does not contribute to the permanent residential need identified in the 2014 GTAA.

3.20 The table below lists the present provision by tenure in the district and shows an increase from 6 to 12 in the number of private sites in the district when compared to the 2012 GTAA.

**Table 2 - Current occupancy of authorised sites: May 2014**

**Permanent Sites (15)**

<table>
<thead>
<tr>
<th>Site Name / Location</th>
<th>No of Pitches</th>
<th>No of Caravans</th>
<th>Tenure</th>
</tr>
</thead>
<tbody>
<tr>
<td>Roundwell</td>
<td>18</td>
<td>24</td>
<td>Public</td>
</tr>
<tr>
<td>Brooks Green</td>
<td>8</td>
<td>12</td>
<td>Public</td>
</tr>
<tr>
<td>Bawburgh</td>
<td>6</td>
<td>-</td>
<td>Public transit site (open spring 2014)</td>
</tr>
<tr>
<td>Carleton Rode 1</td>
<td>6</td>
<td>7</td>
<td>Private</td>
</tr>
<tr>
<td>Carleton Rode 2</td>
<td>1</td>
<td>1</td>
<td>Private</td>
</tr>
<tr>
<td>Easton 1</td>
<td>1</td>
<td>3</td>
<td>Private</td>
</tr>
<tr>
<td>Easton 2</td>
<td>5</td>
<td>4</td>
<td>Private</td>
</tr>
<tr>
<td>Easton 3</td>
<td>1</td>
<td>2</td>
<td>Private</td>
</tr>
<tr>
<td>Flordon</td>
<td>2</td>
<td>6</td>
<td>Private</td>
</tr>
<tr>
<td>Newton Greenways</td>
<td>1</td>
<td>3</td>
<td>Private</td>
</tr>
<tr>
<td>Norwich Common - Wymondham</td>
<td></td>
<td>4</td>
<td>Private</td>
</tr>
<tr>
<td>Spooner Row</td>
<td>8</td>
<td>10</td>
<td>Private</td>
</tr>
<tr>
<td>Tharston</td>
<td>2</td>
<td>3</td>
<td>Private</td>
</tr>
<tr>
<td>Thorpe Abbots</td>
<td>6</td>
<td>6</td>
<td>Private</td>
</tr>
<tr>
<td>Suton (Travelling Show people)</td>
<td>1</td>
<td>1</td>
<td>Private</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>70</strong></td>
<td><strong>86</strong></td>
<td></td>
</tr>
</tbody>
</table>

Source: SNC May 2014

**Temporary Sites: May 2014 (1)**

<table>
<thead>
<tr>
<th>Site Location</th>
<th>Pitches</th>
<th>Caravans</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Forncett St Peter</td>
<td>1</td>
<td>1</td>
<td>Temporary permission until July 2015</td>
</tr>
</tbody>
</table>
Current Tolerated Sites: May 2014 (4)

<table>
<thead>
<tr>
<th>Site Location</th>
<th>Pitches</th>
<th>Caravans</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Aslacton</td>
<td>3</td>
<td>3</td>
<td>Tolerated</td>
</tr>
<tr>
<td>Needham</td>
<td>1</td>
<td>1</td>
<td>Tolerated</td>
</tr>
<tr>
<td>Stockton A146</td>
<td>1</td>
<td>1</td>
<td>Tolerated</td>
</tr>
<tr>
<td>Wortwell</td>
<td>1</td>
<td>1</td>
<td>Tolerated</td>
</tr>
</tbody>
</table>

Source: SNC May 2014

Other Unauthorised Sites (2)

<table>
<thead>
<tr>
<th>Site Location</th>
<th>Pitches</th>
<th>Caravans</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Morley St Botolph</td>
<td>1</td>
<td>3</td>
<td>Retrospective planning application, (non determined)</td>
</tr>
<tr>
<td>Costessey</td>
<td>1</td>
<td>1</td>
<td>none</td>
</tr>
</tbody>
</table>

Other live encampments (2)

<table>
<thead>
<tr>
<th>Site Location</th>
<th>Pitches</th>
<th>Caravans</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Diss area</td>
<td>0</td>
<td>1</td>
<td>none</td>
</tr>
<tr>
<td>Harlston</td>
<td>0</td>
<td>1</td>
<td>none</td>
</tr>
</tbody>
</table>

Total: 97

3.21 Figure 1 below graphically illustrates the spatial distribution of traveller sites in the district and neighbouring authorities while figure 2 illustrates the indicative positions of historic encampments through the district.
Figure 1

South Norfolk Gypsy & Traveller Sites
Existing Pitches
in & adjacent to South Norfolk - indicative
Monitoring

3.22 The Council's adopted planning policies are monitored through the Annual Monitoring Report (AMR). One of the key objectives of the Government’s Gypsy and Travellers policy and this Local Plan is to reduce the number of unauthorised developments within South Norfolk. To ensure the progress towards this objective is monitored, an additional indicator is proposed to be added to the annual monitoring framework covering the number and size of unauthorised developments.

3.23 If new policies are proposed there may be a further requirement to define further appropriate indicators.

Gypsy and Traveller Local Plan Objectives

It is proposed that the following objectives are used to guide the production of the GTLP, and to ensure that the process of allocating sites has a clear direction:

1. Provide sites to accommodate the objectively assessed need over a reasonable timescale
2. Improve access to services for Gypsies and Travellers by providing sites in the most sustainable locations
3. Maintain and protect relations between the settled and travelling communities
4. Reduce the number and frequency of unauthorised encampments
5. Protect local amenity and the natural environment
6. Provide a suitable framework for assessing future applications by applying the currently draft Development Management policy DM3.4.
4 ISSUES & OPTIONS

4.1 The issues and options set out below are those that the Council consider the most relevant in providing sites for Gypsies & Travellers. In assessing the appropriate level of pitch provision and site selection criteria there will undoubtedly be varying opinions as to how the assessment should be made and what factors should be taken into account. The questions however do not represent a statement of intent but are a starting point for discussion and debate.

Issue 1: Should the Gypsies and Travellers Local Plan cover the periods to 2026 or 2031?

4.2 Currently the JCS and South Norfolk emerging Local Plan Documents cover the period up to 2026. The NPPF in paragraph157, states that Local Plans should:

- plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework;
- be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date…

The JCS identified Gypsy and Traveller need up until 2011. This need has been met. The intention is for a base year of 2011 to be adopted.

4.3 A 15 year time frame, would take the time line to 2026, in line with the end date of the JCS and other emerging Local Plan Documents, leaving 11 years for the plan to cover.

The preferred approach would be to plan for a longer time frame to 2031, bringing the Local Plan in line with the evidence base and allowing for a 15 year lifespan on adoption.

Option 1
Set the plan period to 2026, utilising a base year of 2011.

Option 2
Set the Plan Period to 2031, in order to align with the current end date of the evidence base and a 15 lifespan on adoption.
Issue 2: Strategic Approach

4.4 National policy contained in the NPPF stipulates that Traveller sites should be sustainable. Selecting the right location for a site is a key element in supporting good community relations and maximising its success. As with any form of housing, poorly located sites will have a detrimental effect on the inhabitant’s ability to access services such as education, health and shopping, and consideration needs to be given to ensuring that proposals to develop sites link in with other broader strategies already adopted.

The JCS sets out the spatial vision which housing provision must conform to:

“The sites will be provided in locations which have good access to services and in locations where local research demonstrates they would meet the needs of the Gypsy and Traveller communities”

Objective 2 of the JCS is:

“to allocate enough land for housing, and affordable housing, in the most sustainable settlements. The settlement hierarchy defines the towns and villages with a good range of jobs, services and facilities”

Option 3

Appropriate provision should be made in line with the JCS, where growth is directed towards the identified hierarchy of centres, areas of growth and service provision.

Option 4

Appropriate provision should be made in line with the identification of broad locations which reflect areas of travel and established links including for reasons of family and business within the Gypsy and Traveller community.
**Issue 3: Site Size**

4.5 JCS Policy 4 states that generally sites will not have more than 10 - 12 pitches, but this may be varied to suit the circumstances of a particular site. Government policy does not advise on the appropriate number of pitches that would be considered conducive to providing a comfortable environment, which is easy to manage, or the number of pitches that could be considered suitable for an extended family unit on one site. Planning Policy for Traveller Sites 2012\(^{18}\) does however advise that in producing the Local Plan Local Planning Authorities should 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. However paragraph 4.7 of the Good Practice Guide for Designing Gypsy and Traveller Sites\(^{19}\) suggests that a maximum of 15 pitches is:

> Conducive to providing a comfortable environment which is easy to manager, however smaller sites of 3-4 pitches can also be successful, particularly where designed for one extended family.

And in paragraph 4.8

> “Sites should ideally consist of up to 15 pitches in capacity unless there is clear evidence to suggest that a larger site is preferable by the local Gypsy or traveller community. Nevertheless, where a larger site is unavoidable, or where one exists already, in few cases smaller “closes” have been created within the site for extended families, thereby retaining the sense of community and creating defensible space.”

The 2012 GTAA\(^{20}\) concluded that:

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\(^{18}\)Planning Policy for Traveller Sites CLG 2012, section 9d  
\(^{19}\)Designing Gypsy and Traveller Sites, Good Practice Guide , DGCL, 2008  
\(^{20}\)Greater Norwich Gypsy & Traveller Accommodation Assessment, ORS, 2012 para 8.11
“Greater flexibility could be shown on pitch sizes at any new sites. When developing new public sites some larger pitches could be included which could accommodate larger Gypsy and Traveller families who require more than two caravans for their household”

There are currently three public sites in South Norfolk. These vary in sizes from 18 pitches at Roundwell, to 8 pitches at Brooks Green and 6 transit pitches at Bawburgh. Although very different in terms of locations, facilities and management arrangements, all operate well. The pitches at Brooks Green are all the same size and have a capacity for 3-4 caravans each. In contrast at the Roundwell site, although it has more pitches, each pitch varies slightly in size, though there is space for 2 caravans per pitch.

In determining site sizes, consideration needs to be given to the need to:

A) Provide sufficient sites to allow those who wish to live together in groups and those who wish to live separately from other groups.
B) Ensure site size will take into account the specific site circumstances, including the surrounding population and density and capacity of local services.
C) Consider the effect of family make up and potential family growth on site size options to prevent overcrowding and potential displacement.

Paragraph 5.3 of the JCS says that:

“… it is proposed that the need for pitches should be met in a number of locations. It is therefore suggested that sites would not normally exceed ten to twelve pitches, though there may be variations in this to suit the circumstances of a particular site.”

4.6 The caravan counts shown in Table 2 indicate that there is a potential under occupancy of the two public sites in South Norfolk in relation to the total potential capacity for on-site caravans. This though needs to be looked at in relation to the number of pitches, size and family units. Each pitch generally has the capacity to accommodate 2 - 3 caravans and there is an element of family expansion that can be met in their current pitch. The 2012 GTAA clarifies that no extra net pitch provision is required for this group21. As part of the assessment process for future provision the Council has reviewed existing site capacity for intensification and or expansion in a separate Topic Paper.

4.7 In terms of ethnic background of the existing on-site Gypsy and Traveller population the 2012 GTAA study identified:

58.7% - Romany Gypsy
16.4% - New age Traveller
10.9% - Irish Traveller
1.8% - Scottish Gypsy or Traveller
3.6% - Other.

21 GTAA ORS, 2012 Paragraphs 7.18-7.21, page 41-42
Issue 4: Site Tenure

4.8 Different forms of tenure on sites may be suitable for different groups, and it is important to recognise that not all members of the travelling community may be able to provide their own site. The GTAA 2014 identified that there could be a requirement of up to 35 additional permanent pitches in South Norfolk, but draws no conclusions on tenure split.

Identified need

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<tr>
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</thead>
<tbody>
<tr>
<td>South Norfolk</td>
<td>8</td>
<td>9</td>
<td>13</td>
<td>5</td>
<td>35</td>
</tr>
</tbody>
</table>

The forms of tenure that may be provided include

- Privately owned and managed to be rented
- Privately owned for owner occupation
- Publically owned and managed by Local Authority or Registered Provider and or privately managed

Option 6

Land should be sought so as to deliver sites in line with the JCS policy – no larger than 10 – 12 pitches.

Option 7

A more flexible approach could be taken in line with Government Guidance. Sites should 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.

Question 3

Which of these options do you prefer and why?

Are there any other reasonable alternatives that the Council should consider?
All three tenures already exist in South Norfolk.

4.9 Evidence suggests that a high provision\textsuperscript{22} of private sites is likely to have benefits in the level of satisfaction among Gypsies and Travellers as well as lower level of expenditure on public sites. However not all Gypsy and Traveller households can afford to purchase / live on private sites.

**Question 4**

What sort of tenures do you consider would best suit the needs of the Gypsy and Traveller community in South Norfolk?

**Issue 5: Mixed Use Sites**

4.10 Guidance\textsuperscript{23} suggests that Local Authorities should consider wherever possible including traveller sites suitable for mixed residential and business use, having regard to the safety and amenity of residents and neighbouring residents.

4.12 If mixed sites are not practical then the guidance recommends that local authorities should consider the scope for identifying separate sites for residential and for business use in close proximity to each other.

4.13 The 2012 GTAA (paragraph 4.15) stated that very few respondents reported that they wanted more space for business needs or asked for better parking facilities.

4.14 The existing public sites in South Norfolk both have secure compounds for storage but these should not be considered as a suitable work space for business use. Some of the existing private sites include permission for on-site workshops.

**Question 5**

Should the Council plan for sites suitable for mixed use which can accommodate both residential and business use?

\textsuperscript{22} GTAA, 2012 ORS para, 1.12

\textsuperscript{23} Planning For Traveller Sites, DCLG, 2012 – Policy F
Question 6

How should the safety and amenity of residents and neighbours be considered?

**Issue 6: Site Criteria**

4.15 Selecting the best locations for Gypsy, Traveller and Travelling Showpeople sites is a key element in supporting sustainability,\(^{24}\) and site selection must comply with relevant government policy and guidance, ensuring the Local Plan seeks opportunities to meet the objectively assessed needs. Significant adverse impacts should be avoided.

On general principles concerning the conservation and enhancement of the natural environment, the NPPF says in paragraphs 110 – 113:

110 - In preparing plans to meet development needs, the aim should be to minimise pollution and other adverse effects on the local and natural environment. Plans should allocate land with the least environmental or amenity value, where consistent with other policies in this Framework.

111 - Planning policies and decisions should encourage the effective use of land and that has been previously developed (brownfield land), provided that it is not of high environmental value. Local planning authorities may continue to consider the case for setting a locally appropriate target for the use of brownfield land.

112 - Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality.

113 - Local planning authorities should set criteria based policies against which proposals for any development on or affecting protected wildlife or geodiversity sites or landscape areas will be judged. Distinctions should be made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status and gives appropriate weight to their importance and the contribution that they make to wider ecological networks.

\(^{24}\) NPPF Para 151, Local Plans must be prepared with the objective of contributing to the achievement of sustainable development. To this end, they should be consistent with the principles and policies set out in this Framework, including the presumption in favour of sustainable development - Under section 39(2) of the Planning and Compulsory Purchase Act 2004 a local authority exercising their plan making functions must do so with the objective of contributing to the achievement of sustainable development.
Planning Policy for Gypsies and Travellers says in paragraph 10 that:

….criteria based policies should be fair and should facilitate the traditional and nomadic life of travellers while respecting the interests of the settled community.

In section 11 it provides further guidance:

Local planning authorities should ensure that traveller sites are sustainable economically, socially and environmentally. Local planning authorities should, therefore, ensure that their policies:

a) Promote peaceful and integrated co-existence between the site and the local community
b) Promote, in collaboration with commissioners of health services, access to appropriate health services
c) Ensure that children can attend school on a regular basis
d) Provide a settled base that reduces the need for long-distance travelling and possible environmental damage caused by unauthorised encampment
e) Provide for proper consideration of the effect of local environmental quality (such as noise and air quality) on the health and well-being of any travellers that may locate there or on others as a result of new development
f) Avoid placing undue pressure on local infrastructure and services
g) Do not locate sites in areas at high risk of flooding, including functional floodplains, given the particular vulnerability of caravans
h) Reflect the extent to which traditional lifestyles (whereby some travellers live and work from the same location thereby omitting many travel to work journeys) can contribute to sustainability.

The following criteria form the background to the site selection matrix which will be used in the identification of preferred sites. The site selection matrix and methodology will be finalised taking into account consultation responses.

In selecting criteria the following should be borne in mind: Both the 2012 GTAA and the 2014 GTAA reported that much of the travelling community in South Norfolk is static. The qualitative review included in the 2012 study identified that 78% of the travelling community respondents had not travelled in the last 12 months; those that do travel do so for reasons of holidays and to attend fairs; there is a strong desire for a settled life style and so that their children can receive education,\(^\text{25}\) nearly all children are currently being schooled, with 68% of children currently in school in primary education; 42% of all household members are aged 16 or under. 27% of all households members were of school age and another 16% were children aged 4 years or

\(^{25}\) GTAA, ORS, 2012 paragraphs 4.19 – 4.24
less. The view that the travelling population in South Norfolk is becoming more static was also upheld through research by officers of South Norfolk Council during the course of production of this Issues and Options document.

4.19 In respect of health 33% of respondents interviewed reported that their household contained at least one member with an ongoing long term health problem. Just under half of these (45%), reported that their health needs required care.

a) Location in or near to settlements/proximity to local services

4.20 Sites in or near existing settlements are prioritised in the JCS settlement hierarchy, paragraph 6.1. Such sites are generally more sustainable than those in remote areas, with better access to services and in particular education and health.

4.21 Given high land values and growth pressures it is considered unlikely that many sites will be made available within settlement boundaries. The reality then would be for sites to be adjacent to settlements with access to local health and education facilities, both primary and secondary, within reasonable proximity to local services and facilities. Locations in the remote countryside or sites close to settlements with few services would not be so desirable and the PPfTS states that sites should be strictly limited in open countryside.

4.22 The two operational public sites in South Norfolk have very different locations in relation to the settled community. The Roundwell site is now adjacent to residential development on two sides. Brooks Green site is located in a more rural location on the outskirts of Norwich, close to small scattered settlements, services (retail) and the road network. Both sites seem to work well for their residents. The new transit site at Bawburgh is located close to the A47 as per JCS policy. The views expressed at the time of site visits and research for this document were that the residents of Brooks Green benefited from and welcomed the relative separation from the nearby settled community, while those at Roundwell, commented that the residents of the site welcomed the closer integration that the site allowed.

4.23 The Council’s preference would be for well related sites located in and near to settlements classed as Other Villages and above in the settlement hierarchy, as defined in the JCS and for sites on previously developed land. This is in line with the approach taken in the Site Specific Allocations and Policies DPD in the district as a whole in accordance with the JCS hierarchy. The priority will be that sites are not isolated so that access to services including education requirements can be reasonably obtained so as to meet the day to day needs of the occupiers, recognising the differences in lifestyle and working patterns and transport preferences.

---

26 Planning Policy for Traveller Sites, DCLG, 2012 paragraph 12
27 Site visits and site manager interviews April 2014
4.24 Similarly, consideration needs to be given to local amenity so as to promote the peaceful and integrated co–existence between the Gypsy and Traveller community and the settled community.

4.25 Other Local Plan documents have used a walking distance of 800 metres\(^\text{28}\) (approximately 10 minutes) to measure the accessibility of a site to a key service. However sites need to be accessible by a choice of sustainable transport options. In practice it is not practical to expect all traveller sites to be within walking distance of existing facilities with no reliance on the private car.

4.26 The Council’s initial preference would be for sites to be located ensuring they are well located to permit easy access to schools and local services.

4.27 A distance of up to 2km (1.43miles) is also suggested by the Institute of Highways and Transportation as an acceptable walking distance to schools\(^\text{29}\). ORS in the 2014 GTAA recommended that priority should be to identify sites within approximately 1 mile (1.6km) of key facilities, as a reasonable walking distance. These recommendations not only reflect the nature of the district but in a practical sense allow for greater flexibility in identifying suitable sites, and could reflect Gypsies and Travellers’ needs better, by allowing for a degree of separation. In addition it is reasonable to assume access to services through a 2 mile car journey. This is the maximum distance after which Norfolk County Council Children’s services are required to provide transport to a primary school. Any development should be at an appropriate scale to its immediate surroundings so as not to cause significant movements and have acceptable traffic impacts on the surrounding minor roads.

<table>
<thead>
<tr>
<th>Option 8</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sites should be located up to 800m from a key service.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Option 9</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sites should be located up to 2km (1.43miles) from a key service.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Option 10</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sites should be located up to 2 miles (3.22km) from a key service.</td>
</tr>
</tbody>
</table>

\(^{28}\) GNPD SHLAA, South Norfolk Site Specific Allocations Document and Wymondham Area Action Plan adopted 800m ‘walking distance’ based upon the Institute of Highways acceptable walking distance.

\(^{29}\) Guidelines for Providing for Journeys on Foot, The Institution of Highways & Transportation, 2000, Table 3.2
4.28 In relation to the location of sites the Council’s preferred approach is for sites to be well related to settlements classed as Other Villages\textsuperscript{30} and above and for previously developed land over Greenfield sites. Locations which are in the remote countryside or settlements with few services will not be preferred.

**Question 7**
Which of these options should be considered the most appropriate? Please explain your answer.
Are there any reasonable alternatives?

4.29 Following the settlement hierarchy, locations in or near to existing identified transit routes and broad locations are prioritised. These are identified as A11, A140, A143 and A47.

**c) Access and vehicular considerations**

4.30 Sites are required to have safe and convenient vehicular access and provide adequate car parking space. The development should avoid significant impacts on local roads and be well related to major routes.

**d) Previously used land**

4.31 National planning policy encourages planning policies and decisions to encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value.

**e) Visual impact**

4.32 Sites should respect the scale of the environment, be of a scale proportionate to the local community and be capable of visual and acoustic privacy. Sites which allow appropriate natural screening will be considered more favourably.

\textsuperscript{30} See paragraph 4.23 for explanatory text
f) Infrastructure

4.33 Any undue pressure on local infrastructure should be avoided. Sites should be served or be capable of being served by appropriate service infrastructure. Sites will not be chosen if this would cause undue pressure on local infrastructure and services.\(^{31}\)

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**g) International, national and local land designations**

4.34 The area has a wealth of environmental assets ranging from international and national status, to those of local importance. The JCS seeks to ensure that the quality and character of the District be protected and enhanced. Site locations must not compromise the objectives of any potential designations. Designated sites will be protected from the adverse impacts of development.

---

**h) Flood risk**

4.35 Caravans and mobile homes are highly vulnerable to flooding. National and local policy dictates not to allocate sites in areas at high risk of flooding, including functional floodplains, i.e. Flood zone 3.\(^{32}\) It is not proposed to deviate from this policy.

---

**i) Health and safety/hazards**

4.36 In order to ensure Gypsy and Traveller sites provide a healthy and safe environment for residents, sites should not be located on contaminated land and avoid areas of unsuitable noise, air quality\(^{33}\) and major hazards such as pipelines.

---

Question 9

Do you agree with the criteria (b-i)? Please give a detailed answer and expand on any reasoning.

Are there any additional criteria which should be considered in selecting the best locations for Gypsy and Travellers?

---

4.37 Contained in Appendix 1 is the proposed scoring matrix. This is based upon the site criteria listed above in paragraphs 4.20 – 4.36. All sites will be subject to a sustainability appraisal (SA). The GTLP SA Framework is based on the SA Framework for the Area Action Plans and Site Specific Allocations Document. Following the Sustainability Appraisal Scoping consultation which took place between 14/02/2014 and 11/04/2014, the SA Framework has been

\(^{31}\) Planning Policy for traveller Sites, DCLG, 2012 paragraph 11

\(^{32}\) Planning Policy for traveller Sites, DCLG, 2012 paragraph 11, NPPF, 2012 DCLG paragraph 100

\(^{33}\) Planning Policy for traveller Sites, DCLG, 2012 paragraph 11 and in line with Joint Core Strategy Objectives
tailored to the specific needs of this process to help to establish the most appropriate sites and policies. All options and sites will be assessed using the SA Framework. The site selection process will therefore be subject to sustainability appraisal.

Questions

10. Are the proposed factors and site assessment criteria seen as robust and a reasonable approach to site selection? Is the approach to the scoring methodology appropriate? Please explain your answer.

11. Are there any other decision-making criteria that should be considered in site assessment – bearing in mind the adopted local policy and national policy?

Existing Sites

4.38 The Council propose to assess permanent and temporary sites, excluding unauthorised sites, unless they are proposed through the call for sites. Unauthorised sites are sites which occur on land which has not been assessed for its suitability for residential purposes and no permissions have been granted. Therefore sites may or may not be suitable for allocation. The options are detailed below:

Option 11
Allocate existing permanent permitted Gypsy and Traveller sites (expansion/intensification), subject to the assessment process.

Option 12
Allocate existing Gypsy and Traveller sites with temporary permission, subject to the assessment process.

Option 13
Allocate existing Gypsy and Traveller sites with no permission (‘unauthorised sites’) if put forward through the call for sites, subject to the assessment process.

Question 12
Do you agree with the Council’s proposed approach (incorporating the above options 11 -13) to existing sites? Please explain your answer.
Implementation and delivery

4.39 The delivery of public sites will require funding. There are a variety of methods of funding the provision of public sites, but those which are entirely new in their development will be more expensive to provide, due to the cost of providing utilities and access. There is only limited public funding available for such provision.

4.40 The Council will seek to deliver public sites through a combination of HCA grant, S106 contributions from the pooled affordable housing off site contributions and through working closely with its development partners. In addition the Council could choose to fund new pitches in part or in full from its capital programme.

Monitoring

4.41 As identified in paragraph 3.22, it is proposed to add a new indicator to the AMR monitoring framework: the number of caravans on unauthorised encampments or developments

5 What happens next?

5.1 At the end of the consultation period, a consultation statement will be produced, which will contain a summary of all the comments received, the Council’s response to the issues raised through the consultation and details of how these issues will be addressed in the next versions of the document if appropriate. Following the submission of sites and comments on the site assessment criteria, work will start on identifying the most suitable sites in the district and producing a preferred option report for further public consultation.

Question 13

Bearing in mind national and local policies, government guidance and best practice, are there any other issues and/or additional comments that the Council should take into account in preparing this Gypsies and Travellers Local Plan?

Identification of Land - Call for Sites

5.2 As part of the current consultation we are seeking information on potential sites in private ownership and unused/surplus public sector land that may be considered suitable for allocation as Gypsy and Traveller sites. Please note in order to be considered suitable for development the sites should be considered against the criteria above and be available as far as can be known.
5.3 If you wish to submit land for consideration please complete the site check list form in Appendix 4, enclosing a site location map with clearly marked boundaries as per below.

**CALL FOR SITES**

With reference to the above criteria and policy considerations do you know of any land in the South Norfolk District that may be suitable and available and deliverable for potential Gypsy and Traveller pitches or Travelling Showpeople?

If so please complete the accompanying site check sheet in Appendix 4 and return as per the consultation details. Please provide as much information as possible, including details of ownership where possible and any justification on why the site would be suitable **ALONG WITH A SITE MAP WITH CLEARLY MARKED BOUNDARIES.**
Appendix 1: Draft Indicative site Scoring Matrix

The scoring system is for comparative purposes and will not be definitive in selecting preferred sites.

The matrix is a method of applying a consistent and objective approach to site selection. The site assessment will be made public during further consultation stages of the document. The matrix will be used to guide site selection which will be subject to further assessment such as the Sustainability Appraisal. The SA links show how these criteria link to the SA Objectives, however it should be noted that this scoring matrix is not intended to be a substitute for the SA.

<table>
<thead>
<tr>
<th>Criteria</th>
<th>Score</th>
<th>comment</th>
<th>SA Objective Links</th>
</tr>
</thead>
<tbody>
<tr>
<td>Site location</td>
<td>Within</td>
<td>Existing settlement boundary</td>
<td>++</td>
</tr>
<tr>
<td></td>
<td></td>
<td>800m – 2,000m of existing settlement boundary</td>
<td>+</td>
</tr>
<tr>
<td></td>
<td>Not within</td>
<td>800m – 2,000m of existing settlement boundary</td>
<td>+</td>
</tr>
<tr>
<td></td>
<td></td>
<td>2 miles</td>
<td>+/- or +/-</td>
</tr>
<tr>
<td>Proximity of site to a primary / secondary</td>
<td>Within</td>
<td>800m</td>
<td>++</td>
</tr>
<tr>
<td>school via safe walking distance</td>
<td>Greater than</td>
<td>800m - 2,000m</td>
<td>+</td>
</tr>
<tr>
<td></td>
<td></td>
<td>2 miles</td>
<td>+/- or +/-</td>
</tr>
<tr>
<td>Proximity of site</td>
<td>Within</td>
<td>800m</td>
<td>++</td>
</tr>
<tr>
<td>Category</td>
<td>Distance/Proximity</td>
<td>Notes</td>
<td>Code</td>
</tr>
<tr>
<td>----------------------------------------------------</td>
<td>------------------------</td>
<td>----------------------------------------------------------------------</td>
<td>------</td>
</tr>
<tr>
<td>Health care via a safe walking route</td>
<td>2,000m / 2 miles</td>
<td>++ /+ / - / +/0</td>
<td></td>
</tr>
<tr>
<td>Proximity of site to a convenience shop via a safe waking route</td>
<td>Within 800m / 2,000m / 2 miles</td>
<td>++ /+ / - / +/0</td>
<td></td>
</tr>
<tr>
<td>Proximity of site to public transport</td>
<td>Within 800m / 2,000m / 2 miles</td>
<td>++ /+ / - / +/0</td>
<td>S 3</td>
</tr>
<tr>
<td>Service availability</td>
<td>Yes / No</td>
<td>++ / - / + / --</td>
<td>S1</td>
</tr>
<tr>
<td>Impacts on existing road network</td>
<td>Yes / No</td>
<td>- / 0</td>
<td>ENV 3</td>
</tr>
<tr>
<td>Safe access from public highway</td>
<td>Yes / No</td>
<td>+ / -</td>
<td>ENV 4</td>
</tr>
<tr>
<td>Adequate car parking / turning space</td>
<td>Yes / No</td>
<td>+ / -</td>
<td>S 7</td>
</tr>
<tr>
<td>On Brownfield land</td>
<td>Yes / No</td>
<td>++ / 0</td>
<td>ENV 6</td>
</tr>
</tbody>
</table>

Locations in or near to public transport are seen to help reduce the reliance on car travel and an important objective of local and national policy.
<table>
<thead>
<tr>
<th>Contamination (probability of)</th>
<th>No History</th>
<th>++</th>
<th>Sites should not be located on significantly contaminated land.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Low</td>
<td>0</td>
<td></td>
<td></td>
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<tr>
<td>High</td>
<td>--</td>
<td></td>
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</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Potential noise issues</th>
<th>Yes</th>
<th>--</th>
<th>Sites should promote peaceful and integrated co-existence between the site and the local community. Noise issues affecting proposed or existing residents may require mitigation. Consider proximity to other dwellings.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Limited</td>
<td>0</td>
<td></td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Visual privacy – site screening</th>
<th>Site is Screened, or has the ability to be screened</th>
<th>+</th>
<th>Appropriate screening where necessary through landscaping and or planting.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Visually exposed and limited possibility of screening</td>
<td>-</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>On land within / adjacent to International, national or local landscape / wildlife designations</th>
<th>International</th>
<th>--</th>
<th>Site locations should not compromise recognised designations. Development should have limited impact on protected habitat, species and natural resources.</th>
</tr>
</thead>
<tbody>
<tr>
<td>National</td>
<td>--</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Local</td>
<td>-</td>
<td></td>
<td></td>
</tr>
<tr>
<td>No designation</td>
<td>0</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Flood Risk</th>
<th>Flood Zone</th>
<th>++</th>
<th>Sites will not be permitted in areas of high risk of flooding, including functional floodplains.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>1</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>2</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td></td>
<td>3</td>
<td>--</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Site availability</th>
<th>Yes</th>
<th>++</th>
<th>Suitable sites must be available.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>No</td>
<td>--</td>
<td></td>
</tr>
</tbody>
</table>

### Overall Conclusion

Key to effects score: ++ Major Positive, + Minor Positive, 0 Neutral Effect, - Minor Negative, -- Major Negative, ? Uncertain Effect
Appendix 2: Historical caravan counts - South Norfolk

<table>
<thead>
<tr>
<th>Survey Date</th>
<th>Authorised sites (with planning permission)</th>
<th>Unauthorised sites (without planning permission)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Private Caravans</td>
<td></td>
</tr>
<tr>
<td></td>
<td>No. of Caravans</td>
<td>Temporary Planning Permission</td>
</tr>
<tr>
<td>2013 - 07</td>
<td>36</td>
<td>1</td>
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<tr>
<td>2013 - 01</td>
<td>35</td>
<td>1</td>
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<tr>
<td>2012 - 07</td>
<td>34</td>
<td>5</td>
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<td>2012 - 01</td>
<td>34</td>
<td>0</td>
</tr>
<tr>
<td>2011 - 07</td>
<td>33</td>
<td>3</td>
</tr>
<tr>
<td>2011 - 01</td>
<td>31</td>
<td>0</td>
</tr>
</tbody>
</table>

Appendix 3 Response Form

South Norfolk Gypsy and Travellers Local Plan Document

Please respond by e mail to lp@s-norfolk.gov.uk
On line at http://www.south-norfolk.gov.uk/

Closing date:5pm on 24th October 2014
Tel: 01508 533805

Or return to The Planning Policy Manager
South Norfolk Council
South Norfolk House
Swan Lane
Long Stratton
Norfolk
NR15 2XE

Name

Position

Organisation

Address

Contact details   TEL:

E mail:
Appendix 3 Response Form continued

Question 1

Which option do you think is the most appropriate for the Council to choose?

Option 1  Option 2

Please explain you reasoning and evidence.


Question 2

Which overarching approach do you agree with? Should the Council Consider any other alternative approaches?

Option 3  Option 4  Option 5

Please expand on your reasoning


Question 3

Which of these options do you prefer and why?

Option 6  Option 7

Are there any other reasonable alternatives that the Council should consider?


Question 4
What sort of tenures do you consider would best suit the needs of the Gypsy and Traveller community in South Norfolk?

Question 5
Should the Council plan for sites suitable for mixed use which can accommodate both residential and business use?
Please explain your answer

Question 6
How should the safety and amenity of residents and neighbours be considered?

Question 7
Which of these options should be considered the most appropriate? Please explain your answer?
Option 8 □ Option 9 □ Option 10 □
Are there any reasonable alternatives?
**Question 8**

Do you consider the approach excluding sites in the remote countryside to be appropriate? Please explain your answer.

**Question 9**

Do you agree with the criteria (b-i)? Please give a detailed answer and expand on any reasoning.

Are there any additional criteria which should be considered in selecting the best locations for Gypsy and Travelling Showpeople sites?

Criteria b yes / no. Criteria c yes / no. Criteria d yes / no.

Criteria e yes / no. Criteria f yes / no. Criteria g yes / no.

Criteria h yes / no Criteria i yes / no

Please expand on your reasons and justification
Question 10

Are the proposed factors and site assessment criteria seen as robust and a reasonable approach to site selection? Is the approach to the scoring methodology appropriate?

Question 11

Are there any other decision-making criteria that should be considered in site assessment – bearing in mind the adopted local policy and national policy?

Question 12

Do you agree with the Council’s proposed approach (incorporating the above options 11 -13) to existing sites? Please explain your answer.
Question 13

Bearing in mind, national and local policies, government guidance and best practice, are there any other issues and or additional comments that the Council should take into account in preparing this Gypsies and Travellers Local Plan?

Question 14

Do you have any comment to make regarding the Interim SA Report?

CALL FOR SITES

With reference to the above criteria and policy considerations do you know of any land in the South Norfolk District that may be suitable and available and deliverable for potential Gypsy and Traveller pitches and or Travelling Showpeople?

I wish to submit land for consideration

PLEASE supply as much information as possible, including ownership details, justification on why the site would be suitable and complete the site check list form in Appendix 4, enclosing a site location map with clearly market boundaries.
### Appendix 4  Site Checklist

<table>
<thead>
<tr>
<th>Site Reference:</th>
<th>Site Area (Ha):</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
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</table>

<table>
<thead>
<tr>
<th>Site Address:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Parish:</th>
<th>Site Ownership and contacts details</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
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</table>

<table>
<thead>
<tr>
<th>Site suggested by:</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Name:</td>
<td></td>
</tr>
<tr>
<td>Address:</td>
<td></td>
</tr>
<tr>
<td>Postcode:</td>
<td></td>
</tr>
<tr>
<td>Email:</td>
<td></td>
</tr>
<tr>
<td>Tel:</td>
<td></td>
</tr>
</tbody>
</table>

Main point of contact:  Yes [ ] No [ ]

<table>
<thead>
<tr>
<th>Agents contact details (if applicable):</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Name:</td>
<td></td>
</tr>
<tr>
<td>Address:</td>
<td></td>
</tr>
<tr>
<td>Postcode:</td>
<td></td>
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<tr>
<td>Email:</td>
<td></td>
</tr>
<tr>
<td>Tel:</td>
<td></td>
</tr>
</tbody>
</table>

Main point of contact:  Yes [ ] No [ ]

<table>
<thead>
<tr>
<th>Additional information about the site:</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Suggested land use:</td>
<td></td>
</tr>
<tr>
<td>(Please tick all that apply)</td>
<td></td>
</tr>
<tr>
<td>G&amp;T Permanent Residential [ ]</td>
<td></td>
</tr>
<tr>
<td>G&amp;T Perm w/ Employment [ ]</td>
<td></td>
</tr>
<tr>
<td>G&amp;T Transit [ ]</td>
<td></td>
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<tr>
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<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Potential number of pitches:</th>
<th>Reduced site possible?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Anticipated time scale for development:</td>
<td></td>
</tr>
<tr>
<td>0-5 years</td>
<td></td>
</tr>
<tr>
<td>6-10 years</td>
<td></td>
</tr>
<tr>
<td>11-15 years</td>
<td></td>
</tr>
<tr>
<td>Current Land Use/boundary treatments in place:</td>
<td></td>
</tr>
<tr>
<td>-----------------------------------------------</td>
<td></td>
</tr>
<tr>
<td>Previous Land Use (if known):</td>
<td></td>
</tr>
<tr>
<td>Surrounding Land Use:</td>
<td></td>
</tr>
</tbody>
</table>

**Access to the site:**

Are there any barriers to undertaking unaccompanied site visits? **YES** ☐ **NO** ☐

If YES, please explain below what the barriers are and provide a contact number for arranging access to the site.

Contact Name: ........................................ Telephone No: .........................

**Please tick the following boxes:**

- The information provided on this form is correct to the best of my knowledge: ☐
- I wish to promote the site for consideration as a Travellers site in the Local Plan: ☐
- I wish to withdraw the suggested site: ☐
- I wish to amend the site boundary: ☐

(Please attach a plan showing the amended boundary)

Signature: ..................................................................................................................

Please print name: ......................................................................................................

Date: ..........................................................................................................................

**Please return the completed form to:**

Planning Policy Manager,
South Norfolk Council, Swan Lane, Long Stratton, Norfolk, NR15 2XE
Email: lp@s-norfolk.gov.uk