Summary of Responses to Gypsies and Travellers Local Plan Issues and Options Consultation

Executive Summary

Given the small size of the response it is a difficult to establish the extent of consensus on any of the substantial points raised in the Issues and options stage. There was a broad acceptance of a criteria based approach to the assessment and designation of sites. However, several submissions sought clarification on the approach suggesting that the process was unnecessarily complicated.

A number of comments supported the provision of smaller sites (e.g. fewer than 6 pitches) as these were seen to be more acceptable as they would minimise the effects on local services and on the environment. No such clarity emerged over the locational issues which split opinion on the possibility of site designation by dispersal, travel pattern or hierarchy of settlements.

Some felt that tenure type (public or private) should be guided by the GTAA and a mix of tenures was supported by the majority of those who commented.

The issue of shared business and residential use on designated sites were in some minds connected to those of welfare and safety and amenity for both the settled and Gypsy and Traveller communities.

A number of public agencies sought appropriate policies to be instigated to ensure the health and safety of the potential designated site’s residents and the security / integrity of the individual agency’s undertakings.

Most commentators requested parity between the handling of criteria for site designations and other related planning issues as would be expected in application that related to the “settled community”.

Some concern (three comments) was expressed that unauthorised sites should not become “authorised” through the process as this might set a precedent for other unauthorised uses of land into the future.

Other issues raised included:

- The need for good cross-border working to ensure the fair apportionment of responsibilities between district and counties.

- Specific criteria based comments – raised by individuals and parishes offering some site specific based suggestions for new criteria. Some seek to reduce the potential for sites in a given area while others concern asserted omissions in the assessment framework.

- The Broads Authority wish to see the inclusion of a range of safeguards which they consider needs to be present in the GTLP, to match their work in other plans including their own emerging Local Plan.
Appendix A

In detail:

1. During the Issues and Options (I&O) consultation, the Council received 43 submissions, which in total generated 235 separate comments, and a total of 16 sites have been put forward, to date.

2. **Question 1** referred to plan duration. The predominant level of support was for Option 2 – i.e. set the plan period to 2031, in order to align with the current end date of the evidence base and a 15 year lifespan on adoption (rather than to align the plan to the rest of the Local Plan documents, which have a 2026 end-date).

3. **Question 2a** concerned the Strategic Approach to be taken in the GTLP and offered three options (3-5 below) to achieve objectives set in national guidance and the Joint Core Strategy for Broadland, Norwich and South Norfolk.

   **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.*

   **Option 5**
   *Appropriate provision should be made in line with JCS Policy but reflecting the historical trends and established links. (i.e. a combination of options 3 and 4)*

4. Four parish councils supported option 3 (a hierarchy of centres); two others supported option 4 (broad locations) while three wished to see the hybrid option 5.

5. In response to **Question 2b** (which sought alternative options for distributing sites) a “do-nothing” approach was suggested by some respondents. This would have the effect of stopping the plan process (and several respondents explicitly stated that the plan process should be dropped.) However, in view of the fact that the Gypsy and Traveller site allocations have been separated from the South Norfolk Local Plan Site Specific Allocations and Policies Document it is necessary to address the matter in a separate Plan. Failure to offer a commitment to planning for these matters would have rendered the South Norfolk Local Plan unsound and caused it to be rejected by the Planning Inspectorate. As a consequence the Council’s planning policies for the control of development and the promotion of growth would have been open to extended challenge, with less control over the location and scale of development (and associated difficulties with delivering sustainable
Furthermore, the Council would be unable to satisfy its obligations under planning and equalities legislation.

6. **Question 3** related to pitch and site size

*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.*

7. There were two parish councils and three individuals expressing support for Option 6 and noting that reduced sized sites were considered likely to have a reduced effect on the environment and the local services. Norwich City Council and four parishes supported the flexibility suggested in Option 7.

8. No other approaches were offered in response to the second part of Question 3 (referred to as Question 3b in the schedule attached at Appendix A) but a number of useful comments were received concerning the size management and pitch numbers per site to inform implementation of options 6 and 7.

9. **Question 4** inquired “What sort of tenures do you consider would best suit the needs of the Gypsy and Traveller community in South Norfolk?”

10. Four parish councils were specifically in favour of public forms of ownership (e.g. Local Authority / Registered Social Landlord) while Norwich City Council stated that the tenures should be guided by the GTAA. The remaining comments were in favour of a mix of tenures.

11. Issue 5 identified the need to include traveller sites suitable for mixed residential and business use, having regard to the safety and amenity of residents and neighbouring residents. (Planning For Traveller Sites, DCLG, 2012 – Policy F applies) The responses to Question 5 reflect a level of concern about the amenity and safety of nearby residents with three parish councils commenting and one objecting. Four parish councils were in favour of the mixed use approach and Norwich City Council again suggested that the level of provision should be determined to accord with the GTAA. The Broads Authority proposed that the sites chosen for mixed use need to be selected on an individual basis reflecting specific individual characteristics.

12. **Question 6** was “How should the safety and amenity of residents and neighbours be considered? ” It gave rise to a range of comments which generally concluded that there should be no difference in approach between the settled population and the Gypsy and Traveller communities. A parish council sought the need for a dialogue to be encouraged between the settled community and the owners/managers/residents of sites.
13. The broad principles of location were included under **Question 7** which was posed, given three options:

*Option 8*
*Sites should be located up to 800m from a key service.*

*Option 9*
*Sites should be located up to 2km (1.43 miles) from a key service.*

*Option 10*
*Sites should be located up to 2 miles (3.22km) from a key service.*

14. One objector proposed Option 8 (the minimum distance) so as to preclude most rural sites – there being so few services available. Among the parish councils who responded there was a 4 to 3 split respectively for options 10 and 9. In response to **Question 7b** an alternative was proposed which suggested that each of the options should become a “potential base for decision making.” Five parish councils supported the flexible use of distance as a means of control while Norwich City Council commented that sites should be well related to services but distance was a matter for South Norfolk Council to determine.

15. These responses were mirrored in those relating to **Question 8** “Do you consider the approach excluding sites in the remote countryside to be appropriate? “ Five parish councils felt that sites in remoter locations should not be discounted without proper consideration and four other responses wanted them rejected.

16. The **Site Assessment Criteria [a] to [i]** suggested by the Council were met with broad acceptance in response to **Question 9a**. Several important matters for interpretation were raised and some clarification of terminology sought/suggested. An additional criterion was suggested under Question 9b which would seek to identify the presence of an existing Gypsy & Traveller site in the vicinity of the site being assessed – in an effort to judge the cumulative effect of sites close at hand. (Note: In an effort to maintain the integrity of the criterion as one that deals with the internal size and shape of the site from a practical perspective, the measurement of the cumulative impact of a site or sites on existing settlements is suggested as an amendment to Criterion 11.)

17. **Question 10** invited general comments on the site assessment criteria approach. Overall, the responses said that the approach was robust and generally reasonable. It was considered that they should be applied in the same way that they would be applied to the settled community for the sake of parity. Network Rail and Anglian Water Services asked for additional criteria in an effort to safeguard the safety of existing assets/property. Natural England seek to introduce constraints to safeguard wildlife interests. One objection was raised to the criteria based approach suggesting that they would offer ‘carte blanche’ for proposals. One parish council and two individuals found the scoring process (when used in conjunction with the assessment matrix) to be complicated and difficult to understand.
18. A number of the agencies and service providers put forward suggested constraints to development in the form of criteria for the scoring mechanism (in response to Question 11), which will need to be considered carefully. This question was also used to voice concerns for some of the more fundamental concerns for the process e.g. one response which doubted that the delivery of new sites would actually reduce the number of unauthorised sites being set up.

19. **Question 12** sought to assess the extent of acceptance of the three options (11, 12 and 13) for the assessment of existing sites, including authorised and unauthorised sites. There were three objections expressed about the potential “legitimation” of unauthorised sites through the process and other views that the inclusion of retrospective allocations was believed to be an unacceptable precedent for the future.

20. Other Q12 comments related to the need for size of sites and proximity to previously authorised sites to be incorporated into the assessment process. Some specific measurement to assess the effects on neighbours was requested as an additional criterion and there were six expressions of support for the inclusion of sites which already exist (approved and unauthorised) as a source of potential land for additional pitches.

21. **Question 13** refers to what happens next in the process and offered the opportunity for any other representations to be made which were not covered in the list of other questions and issues. As such it has given rise to a diverse range of representations. Even so it has given rise to some interesting points for consideration as the Council moves forward. They fall broadly into the following groups:

- **Good cross border working** – inter county and inter district cooperation was requested in several submissions, predominantly to ensure that there was a fair and regular reassessment of the dispersal of sites.

- **Specific criteria based comments** – raised by individuals and parishes alike - they offer some site specific based suggestions for new criteria. Some may seek to reduce the potential for sites in a given area while others concern omissions in the assessment framework.

- There were some 20 comments from the Broads Authority who want to see the inclusion of a range of material which they consider needs to be present in the GTLP, to match their work in other plans including their own emerging Plan. This will ensure proper safeguards are present to protect the special designations which lie within the Broads Authority area.

- There were eight objections to the delivery of new sites, including a group of objections relating to the tolerated site at Grays Lane, Aslacton.

22. Some people felt unable to comment on the Sustainability Appraisal (**Question 14**) stating that the document was too detailed and technical to be
easily understood. Several new sites were brought to the Council’s attention through the ‘call for sites’ in Question 15.