

Author	North Norfolk District Council
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North Norfolk District Council's response to Inspector's Matters, Issues & Questions (6.1 to 6.3) in relation to:

Matter 6: Gypsy, Traveller & Travelling Showpeople's Accommodation (Policy HOU5)

Issue: Whether the plan makes sufficient provision for pitches and plots to meet the needs of Gypsies, Travellers and Travelling Showpeople.

References in square bold brackets **[xx]** refer to Examination Library document numbers, their page and/or paragraph. The Examination Library can be accessed at:

www.north-norfolk.gov.uk/localplanexamination

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Introduction

This document is North Norfolk District Council's response to the Matters, Issues and Questions identified for examination by Inspector David Reed of the Planning Inspectorate, as published on 3 November 2023 [EH002]. This is one of eleven separate response papers produced to address the specific matter and issue as identified on the front page.

Each response paper includes a number of references to specific evidence which has been relied upon in answering the matters, issues and questions. These reference numbers relate directly to the Examination Library website, where all evidence is published:

www.north-norfolk.gov.uk/localplanexamination

References to 'modifications' relate to such modifications requested by the Planning Authority in Schedules 4 and 5 submitted alongside the Plan [A5.11 and A5.12]. For ease of reference, where these requested modifications relate to the Councils response to each question, details have been included in this response.

Response to Inspector's questions

6.1 Is the Norfolk Gypsy, Traveller and Travelling Showpeople Needs Assessment (Document E3), dating from 2017, sufficiently up to date to provide the necessary evidence on which to base the plan? Should an updated assessment be carried out?

6.1.1 The Norfolk Caravans and Houseboats Accommodation Needs Assessment, Including for Gypsies, Travellers and Travelling Show people, 2017 [E3] is the most up to date and robust assessment of the needs of Gypsies and travellers in the district.

6.1.2 The evidence is proportionate to the Plan, and, for North Norfolk, concluded that the future need for permanently occupied pitches is likely to be very small and mainly arises from the few Gypsy families already resident in the district and potentially forming new households within the existing family units on existing sites. Transit pitches for seasonal visits to the district are available at Fakenham and Cromer and have proved to be sufficient to address the demand for these types of sites.

6.1.3 Since 2017 the Council has received just one planning application for the formation of 1 Gypsy/Traveller pitch comprising the siting of 1 Mobile home, and 1 Porta cabin for ancillary residential use. Illegal transit encampments remain very low and the two authorised sites provide adequately to address the need. In light of the extremely low levels of need and given that it arises from already resident families the Authority does not consider it necessary to update the evidence which covers the period up to 2036.

6.2 In the interests of effectiveness, should the numerical requirement for additional pitches and plots, however small, be set out in the plan?

6.2.1 Gypsy and Traveller and Travelling Showpeople households will form part of the household projections, concealed households and market signals which underwrite

the OAN calculation contained in the SHMA. The Plans overall housing requirement includes the requirements for Gypsy and Travellers.

- 6.2.2 It is recognised that criteria 9 of the [Planning policy for traveller sites, UK Gov 2015](#) sets out that '*Local planning authorities should set pitch targets for gypsies and travellers.*'
- 6.2.3 As identified in the Norfolk Caravans and Houseboats Accommodation Needs Assessment, Including for Gypsies, Travelers, and Travelling Show people, 2017 [E3], the annualized requirement for residential pitches is 0.4. This translates into a requirement for 8 new pitches across the district during the Plan period. This is mainly derived from existing family growth where there is the potential need for an additional pitch arising from new family formations expected to arise from within existing family units on sites.
- 6.2.4 The plan includes a supportive policy which provides an effective mechanism for all newly arising needs to be met. The Council does not consider that a modification to the Plan is necessary for effectiveness reasons. Nevertheless, the Authority agrees that the inclusion of the requirements in the supporting text to Policy HOU 5 would be helpful for reasons of clarity and would be content to modify the supporting text accordingly.

6.3 Should an allocation(s) be made to meet the identified need? Alternatively, if a criteria-based policy is sufficient in the circumstances, are the criteria in Policy HOU5 positively prepared, justified, effective and consistent with national policy?

- 6.3.1 The use of allocations was considered as an alternative way of meeting the need, and, along with the preferred policy option, this alternative was consulted on at Regulation 18 stage as well as being subjected to Sustainability Appraisal. Given the need for potential new pitches over the Plan period is identified as very modest and site-specific, arising mainly from those families already resident in the district (13 pitches), the intensification and expansion of existing sites is likely to be the most appropriate approach. Given the small amount of identified need, the large rural nature of the district covering approximately 870 sq km (excluding the Broads), and the spatial distribution of settlements and population, the allocation of one or more specific sites would be a disproportionate approach and not aligned to the levels and type of need.
- 6.3.2 The use of a criteria led policy is entirely appropriate in these circumstances and Policy HOU 5 is positively prepared, justified, effective and consistent with national policy.
- 6.3.3 The criteria-based approach set out in Policy HOU5 accords with the criteria set out in the national [Planning Policy for Traveller sites, 2015](#) and provides a flexible approach that is positively prepared in a way that address the likely needs of the Gypsy and Traveller community and which promotes integration and sustainable development across the whole district.