

APPENDIX 6 SUMMARY OF REPRESENTATIONS GYPSY AND TRAVELLER ACCOMMODATION ASSESSMENT (October 2023)

Rep ID	Respondent	Paragraph/Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
TOPIC PAPER							
GYPSY AND TRAVELLER ACCOMMODATION ASSESSMENT							
	Natural England	General	Natural England does not have any specific comments on this Gypsy and Traveller Accommodation Assessment.	None	n/a	Noted	n/a
	Stuart Carruthers	General	There are issues with the definitions used by ORS. The issues are sensitive as many Gypsy / Travellers are unable to secure land in Flood Zone 1 in which to live and if they develop in Flood Zone 3 they need a building to meet Environment Agency requirements for a safe refuge. The Kings Lynn Council has argued that buildings developed by Gypsy / Travellers do not form of a Gypsy site even if the occupiers are Gypsy's. This resulted in appeal decision 3286363 and is going to lead to an application for a caravan site next to a perfectly good dwelling to enable Gypsy / Travellers to have somewhere to sleep. ORS has conceded that the definitions used for the survey were incorrect.	None	Yes	The Council has prioritised trying to meet the need for G&T on existing sites. To achieve this, the Council has undertaken a site assessment for all existing G&T sites (in accordance with the HELAA methodology) to see whether they are considered available, suitable, and deliverable to allocate and meet the needs over the Plan period. Due to significant constraints, particularly around the risk from flooding, the Council is now undertaken a targeted 'call for land' consultation to seek additional land within less constrained parts of the Borough. The Council has received recent planning applications for G&T accommodation within FZ1. This demonstrates that there is available (less constrained) land for G&T provision within the Borough. To comply with National Policy, we need to focus any search for new land for G&T accommodation in FZ1 so that sequential test requirements are met.	No Change
	Environment Agency	General	Thank you for consulting us on the additional evidence base documents for the KLWN Local Plan. We have reviewed the documents, and we have no further comments to make. Please note our comments on Gypsy and Traveller sites are included within our Statement of Common Ground.	None	n/a	Noted	n/a
APPENDICES							
APPENDIX A: Table of Figures							
APPENDIX B: Glossary of Terms/ Acronyms Used							
APPENDIX C: Undetermined households							
APPENDIX C: Undetermined households							
APPENDIX D: Households that did not meet the Planning Definition							
APPENDIX E: Site and Yard List							
	Goodall, Lorna	Figure 6	The Elms, South Creake – Main area of concern. Horrified to note that The Elms South Creake has apparently permission for 10 undeveloped pitches, this area of land has been under appeal numerous times and enforcement and has been deemed to be abandoned it has been a source of considerable nuisance to local residents how has this happened?	None	No	Comments noted. GTTA implies that the site at The Elms is an authorised site which is incorrect. We will review our information and make any factual corrections accordingly. The Elms site was included in the GTTA as there is planning history on the site which implies that there may have been households within the Borough that have future housing needs that the Council has to look to accommodate over the Plan period.	n/a – Changes to the Local Plan will be made in due course when site allocations are proposed
	Goodall, Lorna	Figure 6	The Jays – permission for 3 static and 5 temporary	None	No	Figure 6 on page 32 purely sets out the number of pitches/plots, the number of interviews that were completed, and any reasons why interviews were not able to be completed. Appendix E sets out that The Jays has permission for one pitch. A pitch may consist of a number of caravans.	n/a
	Goodall, Lorna	Figure 6	Whitegates – never given a number for permission is down as one and is absolutely full	None	No	Figure 6 on page 32 purely sets out the number of pitches/plots, the number of interviews that were completed, and any reasons why interviews were not able to be completed. Appendix E sets out that Whitegates has permission for one pitch. A pitch may consist of a number of caravans.	n/a
	Goodall, Lorna	Figure 6	Oak Tree caravan site has permission for 6 (I think)	None	No	Figure 6 on page 32 purely sets out the number of pitches/plots, the number of interviews that were completed, and any reasons why interviews were not able to be completed. Appendix E sets out that Oak Tree Caravan site has permission for one pitch. A pitch may consist of a number of caravans.	n/a
	Goodall, Lorna	Figure 6	The Oaks has one and is not mentioned	None	No	The Oaks is included in Figure 6 under Travelling Showpeople Sites on page 34.	n/a
APPENDIX F: Questionnaire							
APPENDIX G: Technical Note on Household Formation and Growth Rates							