



Stage 2 - Full Equality Impact Assessment Form

1. What is the service area(s) and who is the lead officer?

- List the Executive Director and Service Manager, plus the person completing this assessment if different. Geoff Hall, Alex Fradley and Luke Brown

The proposed sites and policy framework form part of the wider policy requirements (under the National Planning Policy Framework) for the ongoing examination of the emerging Local Plan for Kings Lynn and West Norfolk. Once adopted, the Local Plan (including the policy for the provision for Gypsies and Travellers) will replace existing policy for the provision for Gypsies and Travellers currently identified in the Core Strategy.

The proposed policy seeks to support the Local Plan's progression through its examination and enable the Council to successful meet its wider policy and legal obligations.



2. What change are you proposing?

The Council has a legal duty under the Housing Act 2004 and through the National Planning Policy Framework (NPPF) to accommodate the housing needs of the borough, including those for Gypsies and Travellers and Travelling Showpeople.

The NPPF states that '*Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, **travellers**, people who rent their homes and people wishing to commission or build their own homes*'.

Having a lack of supply of permanent accommodation can adversely affect the travelling community. Providing enough suitable accommodation improves the ability to meet other primary needs, especially education and health. Accommodation also enables Gypsy and Travellers to continue to live a nomadic life, in line with their culture and traditions. It also enables greater access to employment opportunities for families to remaining together.

The provision of suitable permanent accommodation also reduces the risk of unauthorised encampments across the Borough.

The Council is seeking to provide enough land to meet the accommodaton needs for the Gypsy and Traveller community over the Plan period, but more speciffcaly within the first five years of Plan. This will be through a combination of sites and locations to site future provision and planning policies to manage new development proposals as they come forward.

This will be a key decision by elected members moving forward in April 2024.



3. How will this change help the council achieve its Corporate Strategy priorities (and therefore your Directorate/service objectives)?

The further consultation document on the proposed sites and policy framework aims to enhance the 'Support our communities' objective within the Corporate Strategy 2023. This will support the health and wellbeing of our communities, help prevent homelessness, assist people with access to benefits advice and ensure there is equal access to opportunities.

We will:

- Increase the number of good quality new homes and associated infrastructure built through direct provision by working with registered social landlords and private sector developers. The Policy will provide space for additional Gypsy and Traveller pitches and plots and accommodation. This will increase the supply of accommodation for the community where it is required.
- encourage private sector housing development that supports local need, delivers on local infrastructure and meets environmental and biodiversity requirements, The policy will support and encourage the development of both private family pitches/sites and social sites to best meet the identified need of the Gypsy and Traveller community in West Norfolk.



4. What is your evidence of need for change?

To understand the level of need required for the Gypsy and Traveller community, the Council produced a Gypsy and Traveller Accommodation Assessment in May 2023. This document identified that there is a need for:

Gypsy and Traveller Accommodation Requirements to 2039

Year Period	Dates	Need (number of pitches)
0-5	2023-2027	69
6-10	2028-2032	10
11-15	2033-2037	11
16-17	2038-2039	5
0-17		95

**the accommodation need has been reduced from the original GTAA to reflect recent planning decisions and appeals.*

Gypsy Traveller and Travelling Showpeople Accommodation Requirements to 2039

Year Period	Dates	Need (number of plots)
0-5	2023-2027	3
6-10	2028-2032	1
11-15	2033-2037	1
16-17	2038-2039	0
0-17		5

Currently, the Council cannot meet these needs under its existing policy framework and is therefore not compliant with the provisions of National Planning Policy and other legislation such as the Housing Act 2004.

It is critical that the Council addresses this issue through the ongoing Local Plan examination so that the Local Plan can be found 'sound' and the Council meets its legal obligations under national planning policy and other legislation.

The proposed consultation document seeks to demonstrate how the Council seeks to meet these accommodation needs for the Gypsy and Traveller community over the plan period.



5. How will this change deliver improved value for money and/or release efficiency savings?

Providing a policy framework for accommodating the needs for Gypsies and Travellers will enable pitches to come forward in a planned and sustainable way to meet the identified accommodation needs of the Gypsy and Traveller Community. Planned development reduces the likelihood of unauthorised encampments, which in turn reduces planning enforcement cases and planning appeals on such sites. This will save the Council time in determining planning applications, reduce time spent on planning enforcement and lead to less planning appeals in the future.

6. What geographical area does this proposal cover?

The proposed sites and policy affect all of the Borough, although the individual sites identified will affect some communities more than others. The proposed sites for accommodating Gypsies and Travellers are located in:

- Emneth with Outwell
- Methwold
- Wiggshall
- South Creake
- Downham Market
- Upwell, Outwell and Delph
- Walsoken, West Walton and Walpole



7. What is the impact of your proposal?

The document proposes to allocate a number of sites across the borough to accommodate the needs for the Gypsy and Traveller community. The majority of this need will be accommodated on existing sites, where appropriate, to address direct needs arising from specific sites.

Those existing sites have access to basic services such as water, electricity and sewage. There are also dayrooms and toilet blocks available on these sites. Any new sites would need to accommodate such infrastructure provision within their development. Their more remote locations mean access to wider education and health services are more limited. The Council will seek to improve access to such services through this Policy. On site facilities and accommodation will also be conditioned through the planning process to make sure they're suitable in terms of accessibility and up to building standards.

The general accommodation needs for the Borough are in response to overcrowding on existing sites and teenagers living with family will need their own pitches in the future. New accommodation provision will enable those younger people or those who are living in overcrowded conditions to have their own pitch/plot. It also enables family member to remain with their wider family on existing sites.

The intensification of existing sites and/ or new sites will provide a positive impact in terms of meeting accommodation needs for Gypsy and Travellers, but could lead to some negative impact on existing communities in terms of an impact on existing infrastructure and the environment. Where such constraints are identified, the Council will seek to minimise any negative impacts through the selection of the most suitable locations which will have the least impact on existing communities.

The proposed policy also reduces conflict in terms of enabling the expansion of existing sites thereby reducing the likelihood of planning enforcement or legal cases in the future. The risk is greater if the accommodation needs of the Gypsy and Traveller Community are not met. Therefore, steps to mitigate potential negative impacts are critical.

It promotes equality in terms of enabling the community to have access to accommodation in line with other forms of accommodations needs as identified in the Local Plan.



8. What data have you used to support your assessment of the impact of your proposal?

The primary objective of this GTAA is to provide a robust assessment of current and future need for Gypsy, Traveller and Travelling Showpeople accommodation in King's Lynn & West Norfolk Borough Council (the Council) area.

As well as updating previous GTAAs, the assessment provides a robust and credible evidence base which can be used to aid the implementation of Local Plan Policies and, where appropriate, identify the provision of new Gypsy and Traveller pitches and Travelling Showpeople plots for the plan period 2023 to 2039. This will enable the Council to meet the 15-year requirements set out in Planning Policy for Traveller Sites (PPTS). The outcomes of this study supersede the outcomes of any previous GTAAs for King's Lynn & West Norfolk Borough Council.

The GTAA has sought to understand the accommodation needs of the Gypsy, Traveller and Travelling Showpeople population in the Council area through a combination of desk-based research, stakeholder interviews, and engagement with members of the Travelling Community living on all known sites, yards, and encampments.

A total of 141 interviews or proxy interviews were completed with Gypsies and Travellers living on sites and on the roadside in King's Lynn & West Norfolk, and a total of 15 interviews were completed with Travelling Showpeople. No interviews were completed with households living in bricks and mortar.

A total of 5 stakeholder interviews were also completed. These included Norfolk County Council, Breckland DC, Fenland DC, South Holland BC and North Norfolk DC.

The fieldwork for the study, including the interviews, was completed between January 2023 and May 2023, and the baseline date for the study is May 2023.

This data and information is publically accessible in the GTAA which is published on the Council's website.

This data was then used to help inform the assessment of sites, The finalised list of proposed sites are those where a direct accommodation need is present and/ or where there is room for expansion.



9. What consultation has been undertaken/will need to be undertaken with stakeholders/ groups directly or indirectly impacted by the proposals and how do you intend to use this information to inform the decision?

Stage 1 of the process was to prepare the Consultation Document which included discussions and consultation with relevant internal and external statutory consultees, neighbouring authorities on existing issues.

Stage 2 of the process is to seek the views and opinions of the wider public. All responses from this public consultation have been reviewed and these have helped inform the final consultation document which will be subject to a decision at Full Council in March 2024. A separate Consultation Statement will detail all responses received and how the Council has sought to address any concerns or issues raised. This will be published for Cabinet.

Stage 3: A further consultation will take place on the Council's proposed sites for allocation in the Local Plan. This is likely to take place in May and June 2024 for a 6-week period after Council approval on the 23rd April 2024.

10. Are there any implications for other service areas?

The proposed sites and policy consultation will have implications for Housing Standards Service in terms of providing comments to consultations and planning applications for Gypsy and Traveller provision.

Communications Service in terms of supporting the planning service through communicating and promoting public consultations.

Planning service in relation to their time and resource in determining future planning applications.



11. What impact (either positive or negative) will this change have on different groups of the population?

The Council are required to meet all accommodation needs for the borough through the Local Plan. This does include other groups and communities such as accommodation for older people, affordable housing and specialist housing for people with disabilities. The Local Plan is already proposing policies for these areas and are currently subject to Government examination.

The proposed sites and policy for Gypsy and Travellers will have a positive affect on the Gypsy and Traveller community. It seeks to address their current unmet accommodation needs and enable planning proposals for such accommodation to be determind through more up-to-date policy. It enables the Local Plan to adequately address the accommodation needs for this area along with other accommodations policies as mentioned previously.

The document also seeks to address their individual accommodation needs – specifically where a localised need has been identified on existing sites. This need is largely a result of existing family members or teenagers seeking their own pitches/plots, but currently have no where to go.

The location of sites is broadly in those locations where the Gypsy and Traveller community wish to stay.

The policy will likely have some negative impact on those existing communities where there are proposals to intensify or identify new sites and locations for Gypsy and Traveller accommodation. These impacts are likely to include impacts to existing infrastructure – especially where existing communities are small in size, impacts to the character of these area in terms of their built form and impacts to the environment, where new sites or extensions to existing sites are proposed on greenfield land.

The Council is confiendent however that any negative impacts can be mitigated through the citing and design of these sites/developments and also through the proposed criteria based policy for assessing planning applications for Gypsy and Traveller accommodation.



12. Other Staff Involved in Assessment (including Corporate Equality Group Representatives), and comments from Equality Work Group Reps

- Stuart Ashworth – Assistant Director for Planning
- Michael Burton – Principal Planning Policy Officer
- Alex Fradley – Planning Policy Manager
- Members of the Corporate Equality Working Group, who have been consulted with and contributed to the full impact assessment as presented.



Full EIA Action Plan

Risk/adverse impact identified (Q11)	Action to be taken to mitigate	By who <i>Include a lead officer for implementing the actions</i>	By when <i>Deadlines/timescales for implementing the actions</i>	Monitoring mechanism <i>What indicators will you use to track the impact of the change when implemented? How will you review its implementation? How do you intend to monitor service take-up?</i>
Impact to existing communities for the proposed sites and locations	A public consultation period is planned so that the wider public and other can review the policy and provide feedback to the Council.	Planning Policy	26 th January until 8 th March 2024	The policy will form part of the monitoring framework for the Local Plan.
Impact to existing communities for the proposed sites and locations	A further public consultation period is planned so that the wider public and other can review the policy and provide feedback to the Council.	Planning Policy	10 th May – 21 st of June 2024.	The policy will form part of the monitoring framework for the Local Plan.



Assessment Completed By: Luke Brown
Job Title: Senior Planning Policy Officer
Date: 27/03/2024