

GNLP Gypsy and Traveller Focused Sites Consultation Summary of Representations and Council Responses

Contents

Table 1 – Summary of Representations by Document Section and Council’s Response	2
Table 2 – Summary of Representations by G&T Site Reference and Council’s Response.....	23
GNLP5004 Land off Buxton Road, Eastgate, Cawston (4 Pitches).....	23
GNLP5005 Land at Strayground Lane, Wymondham Recycling Centre (now referenced as GNLP5028 A and B)	30
GNLP5009 Land off Hockering Lane, Bawburgh (WITHDRAWN)	35
GNLP5014 Land adjacent to A47 North Burlingham Junction (WITHDRAWN)	40
GNLP5014 Land adjacent to A47 North Burlingham Junction (WITHDRAWN)	40
GNLP5019 Land north of Shortthorn Road, Stratton Strawless (8 additional pitches)	48
GNLP5020 Romany Meadow, The Turnpike, Carleton Rode (6 additional pitches)	50
GNLP5021 Land at the Old Produce Shop, Holt Road, Horsford (WITHDRAWN).....	54
GNLP5022 Land at the Oaks, south-east of Letter Box Cottage, Reepham Road, Foulsham (5 additional pitches)	56
GNLP5023 Land off Strayground Lane, Wymondham (now GNLP5028 A and B).....	59
GNLP5024 Land off Ugate Street, Carleton Rode (4 additional pitches)	65
GNLP5013 Land at Ketteringham Depot (10 pitches)	69
VCHAP GT Site 1 and Site 2	70
VCHAP 3 Sites at Denton, Middle Road SOUTH NORFOLK	71

Table 1 – Summary of Representations by Document Section and Council’s Response

Section of document / Document	Total Comment (Nos)	Summary of Representation by Organisation or Member of the public	Councils’ Response	Changes to Documents
Introduction	19 (4 support, 6 object and 9 comments)	Coal Authority – No specific comments	Response to Coal Authority -- Noted	No change
		Broads Authority – No comments	Response to Broads Authority -- Noted	
		Wicklewood Parish Council – welcomes consultation and asks that future planning applications for sites within their parish be refused unless the sites have been considered and approved through this process.	Response to Wicklewood Parish Council -- Comment noted. It is important that the Local Plan can demonstrate a 5-year land supply, therefore it is important to adopt a Local Plan which allocates sufficient G&T sites to meet the need. As ‘windfall’ permissions are an important source of supply, existing and proposed policies remain supportive of windfall sites where appropriate criteria can be met.	No change - policies are supportive of windfall applications

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		<p>Environment Agency – East Anglia is identified as an area of serious water stress. Any new developments should be constructed to meet the optional higher water efficiency standard of 110 litres/person/day.</p>	<p>Response to the Environment Agency – Agreed: the strategic policies address water efficiency, and these requirements will apply to caravan accommodation.</p>	<p>No change</p>
		<p>Anglian Water – have contributed to the utilities assessment of proposed sites. Sites adjacent to larger settlements that are serviced by a water recycling centre (WRC) are more sustainable and resilient options. Sites in rural locations are likely to be reliant on non-mains sewerage solutions such as private package treatment plans. A joint advice note by Anglian Water and Environment Agency is available.</p>	<p>Response to Anglian Water -- Comment and advice noted. Utilities connections are amongst the site considerations. Nevertheless, some sites will rely on septic tanks for waste water disposal.</p>	<p>Please see site assessments and policies</p>
		<p>Historic England – Recommendations from site assessments and SA are not always reflected in the policy. A number of relatively minor changes to the policies are recommended – see individual sites.</p>	<p>Response to Historic England response -- Comment noted. Individual to site assessments and policies to be amended as suggested.</p>	<p>Make site assessment and policy amendments</p>

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		<p>Network Rail – Present issues to be considered if sites are located near to Network Rail infrastructure.</p>	<p>Response to Network Rail – No issues of concern have been identified with respect to rail infrastructure.</p>	<p>No change</p>
		<p>Norfolk County Council Gypsy Roma Traveller Service – Team have visited established landowners with existing pitches to tell them about the GNLP consultation. This has been welcomed. A potential further 3 sites at Guestwick, Hevingham and Flordon have been identified. Also, the engagement has raised awareness of the support mechanisms in place regarding the potential development of owned land in the future – thereby promoting fairness and equality. This is an excellent piece of work which is greatly welcomed by the GRT community.</p>	<p>Response to Norfolk County Council Gypsy Roma Traveller Service response -- Comment noted. The new sites put forward at Guestwick and Hevingham have been assessed and subjected to public consultation as requested by the Planning Inspectors examining the plan. The proposed site at Flordon has not been progressed by the landowner.</p>	<p>The new sites received have been assessed and consulted upon.</p>
		<p>Member of public comments -- a) Support in principle but sites need proper infrastructure. b) Support for 12 sites being considered. The figure of 53 pitches is in stark contrast to the thousands of</p>	<p>Response to public comments -- a) Support noted b) Not adequately planning for the accommodation needs of Gypsies and Travellers could lead to the GNLP not being</p>	<p>No change - The G&T Topic Paper (<u>H3.1</u>) has been produced to explain the</p>

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		<p>homes planned for the Greater Norwich area</p> <p>c) Objection to the whole proposal</p>	<p>judged 'sound' through its examination. There are wider legal responsibilities as well, because under the Equalities Act 2010 public authorities have responsibility to prevent discrimination. This legislation applies to certain Gypsies and Travellers who are recognised as a distinct ethnic group.</p> <p>c) The GNLP it must be prepared in accordance with nationally set guidance, called the National Planning Policy Framework, and this includes meeting the accommodation needs of "different groups in the community", which includes "travellers" (para 62). A related Government policy, which the GNLP must also comply with, called the Planning Policy for Traveller Sites, makes the approach that must be taken clear. This says: "The Government's overarching aim is to ensure fair and equal treatment for travellers, in a</p>	<p>current position with respect to G&T accommodation needs.</p>

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			way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community” (para 3).	
		Member of the public comments -- Comments regarding Site GNLP5009 in Bawburgh	Response to public comments -- Please see the responses under site specific representations	GNLP5009 has been removed
		Member of the public comments -- Postwick Park and Ride should be investigated	Response to public comments -- Possible sites at Postwick were investigated, but none of the landowners in this area were willing to make land available.	No change
Context	3 (0 support, 2 object, 1 comment)	Member of the public comments -- Needs to be clarity on how demand for pitches is calculated. If there are 132 pitches why is there a need for more if analysis only shows need for 53 pitches?	Response to public comments -- The Greater Norwich authorities commissioned a company called RRR Consultancy to undertake the Gypsy and Traveller Accommodation Assessment (GTAA) (B8.3) so that the number of new pitches needed is accurately calculated. The GTAA considers all relevant factors, like population change through births,	No change - A G&T Topic Paper (H3.1) has been produced to explain the current position with respect to G&T accommodation needs.

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			<p>deaths, and migration, as well as considering how many of the existing pitches are underused.</p> <p>Supporting the GTAA is G&T Topic Paper <u>H3.1</u>, which from pages 5-8 explains the work done to identify the number of pitches required. Appendices to the topic paper (references H3.2 to H3.6) provide data about the existing stock of pitches, which pitches are vacant, and provides information about which pitches have planning permission but are not yet completed. The analysis shows that there is a need for 53 pitches in addition to existing pitches.</p> <p>In October 2022 the Court of Appeal ruled in what is known as the Lisa Smith case, and the effect of this is to change the definition of Gypsies and Travellers for planning purposes. The needs requirement of 53 pitches by 2038 takes into account the court's findings. This means the Greater</p>	

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			Norwich authorities are seeking to meet the full need for Gypsies and Travellers on the basis that the defining characteristic of this ethnic group is not their nomadic lifestyle but the act of living in a caravan.	
		Member of the public comments -- Comments regarding Site GNLP5009 in Bawburgh (see site summary)	Response to public comments – Please see the responses under site specific representations.	GNLP5009 has been removed
Background	1 Comment	Member of the public comments -- Needs to be clarity on how number of pitches relate to each other. Are the 53 in addition to the 98 current and 4 vacant?	Response to public comments -- The Greater Norwich authorities commissioned a company called RRR Consultancy to undertake the Gypsy and Traveller Accommodation Assessment (GTAA) (B8.3) so that the number of new pitches needed is accurately calculated. The GTAA considers all relevant factors, like population change through births, deaths, and migration, as well as considering how many of the existing pitches are underused.	No change - A G&T Topic Paper (H3.1) has been produced to explain the current position with respect to G&T accommodation needs.

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			<p>Supporting the GTAA is G&T Topic Paper <u>H3.1</u>, which from pages 5-8 explains the work done to identify the number of pitches required. Appendices to the topic paper (references H3.2 to H3.6) provide data about the existing stock of pitches, which pitches are vacant, and provides information about which pitches have planning permission but are not yet completed. The analysis shows that there is a need for 53 pitches in addition to existing pitches.</p> <p>In October 2022 the Court of Appeal ruled in what is known as the Lisa Smith case, and the effect of this is to change the definition of Gypsies and Travellers for planning purposes. The needs requirement of 53 pitches by 2038 takes into account the court's findings. This means the Greater Norwich authorities are seeking to meet the full need for Gypsies and Travellers on the basis that the defining characteristic of this</p>	

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			ethnic group is not their nomadic lifestyle but the act of living in a caravan.	
Meeting the need for pitches	6 (1 support, 4 objections, 1 comment)	<p>Weston Longville Parish Council – Supportive of sites in plan and opposed to 'windfall' provision outside identified sites</p>	<p>Response to Weston Longville Parish Council -- The support for a plan-led approach is noted. Nevertheless, existing and proposed policies support windfall permissions where criteria are met. Windfall permissions can also complement a plan-led approach to site provision.</p>	No change - policies are supportive of windfall applications
		<p>Member of the public comments --</p> <ul style="list-style-type: none"> • Comments regarding Site GNLP5009 in Bawburgh (see site summary) • Query conflict between pitch numbers in paragraphs 13 and 16 • It appears that GNLP5014 at North Burlingham must be delivered otherwise plan will not return number of pitches – is it a done deal? 	<p>Response to public comments -- Sites GNLP5009 and GNLP5014 are no longer being promoted. Please see site specific representations.</p>	GNLP5009 and GNLP5014 have been removed

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Consideration of equalities issues	0	No comments made on this section		
Responding to this consultation	52 (0 support, 51 object and 1 comments)	<p>Member of the public comments --</p> <ul style="list-style-type: none"> • Postwick Park and Ride should be investigated 	<p>Response to public comments --</p> <p>The GNLP has conducted an extensive search for sites, by engaging with private landowners, public sector organisations and speaking to the Gypsy and Traveller community. Possible sites at Postwick were investigated but none of the landowners in this area were willing to make land available.</p>	No change
		<p>Member of the public comments --</p> <ul style="list-style-type: none"> • Criticism of website and consultation • Criticism of quality and accuracy of consultation documents 	<p>Response to public comments --</p> <p>Every effort is made to make the website clear and user-friendly, and the Greater Norwich authorities employs a specialist website company to assist. This company specialises in websites for local councils who are writing local plans and serves many local authorities across the country.</p> <p>Running consultations online is the most efficient and effective way to</p>	No change

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			<p>let people have their say, but paper response forms were also available for those that preferred to use the post. Members of the GNLP team were also available to assist with queries by telephone.</p> <p>The consultation documents use a clearly explained methodology to assess site and are of high quality.</p>	
Future work in allocating gypsy and traveller sites	2 objections	<p>Member of the public comments --</p> <p>a) Comments regarding Site GNLP5014 in North Burlingham (see site summary)</p> <p>b) Objection to process of site selection, existing sites should be expanded and locating sites in other authority areas should be investigated.</p> <p>c) Use of Postwick Park and Ride should be considered.</p>	<p>Response to public comments --</p> <p>Comment noted, please see the updates under site specific comments.</p> <p>a) GNLP5014 has been withdrawn.</p> <p>b) The GNLP has conducted an extensive search for sites, by engaging with private landowners, public sector organisations and speaking to the Gypsy and Traveller community.</p> <p>c) Possible sites at Postwick were investigated but none of the landowners in this area</p>	GNLP5014 has been removed

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			were willing to make land available.	
Distribution map of the favoured, reasonable alternative and unreasonable sites	4 (0 support, 4 objections)	Member of the public comments a) Object b) Comments regarding Site GNLP5009 in Bawburgh (see site specific summary) c) Comments regarding Site <i>GNLP5014</i> in North Burlingham (see site specific summary)	Response to public comments -- GNLP5009 and GNLP5014 have been removed from the plan. Please see the site-specific responses for further information.	GNLP5009 and GNLP5014 have been removed
Site assessment information	44 (1 support, 36 object, 7 comments)	Mr T Beer (Agent) on behalf of landowner Foulsham – Support for site GNLP5022. We would recommend assuming a minimum of 500sqm per pitch, instead of 300sqm, as these will be developed for families. Additional pitches could be brought forward in next 1-2 years.	Response to GNLP5022 landowner -- Support noted, allowing a minimum of 500 sqm per pitch could risk making many sites, both privately or publicly owned, financially unviable. Whereas as noted in the Site Assessment (Jan 2023) <u>(H2.1)</u> using 320 sqm per pitch, which is taken from the Leeds Gypsy and Traveller Site Design Guide (<u>Gypsy and Traveller Site Design Guide.pdf (leeds.gov.uk)</u>), represents a sensible average to apply at plan-making, when details about the price of land, build costs,	No change - Appropriate pitch sizes have been assessed on a site-by-site basis

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			<p>and needs of the future residents are unknown.</p> <p>If the recommendation for a minimum of 500 sqm per pitch is over concerns about sites becoming overly developed this is valid. However, these issues are better dealt with via the caravan licensing regime, which amongst other matters ensures there is an adequate spacing to meet fire safety regulations.</p>	
		<p>Acle and Upton Parish Council object to site GNLP5014 due to poor air quality from A47 traffic, constant traffic noise from A47, no safe walking route to access services, shops and schools, no capacity at Acle Medical Centre, no sewerage system to connect to, no safe place for school bus to stop</p>	<p>Acle and Upton Parish Council response -- Comments noted site GNLP5014 has been removed from the plan. Please refer to site specific responses for further information.</p>	<p>GNLP5014 has been removed</p>
		<p>Member of the public comments Site GNLP5004 Cawston – (see site summary for general comments).</p>	<p>Response to public comments – Please see the responses under the site-specific representations.</p>	<p>See the updated site assessment</p>

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		<p>Member of the public comments Site GNLP5014 North Burlingham – (see site summary for general comments). Comments specific to site assessment: - Green rating for utilities capacity/infrastructure is incorrect as site is completely un serviced by clean water and sewage infrastructure and is well outside sewer catchment area as identified by Anglian Water. Significant investment would be required. Green rating for flood risk does not consider surface water flooding. Loss of agricultural land is acknowledged but disregarded due to development of A47 which is wrong. - Report is written by someone with no idea of the local area. It states minor negative impact on air and noise – it will be beside one of the most used roads in the area. It states little impact on landscape character – this will create urbanisation to a very rural location. Services and schools are struggling and there is little local employment. No safe pedestrian access which will encourage them to drive which</p>	<p>Response to public comments – Please see the responses under the site-specific representations.</p>	<p>information and policy</p> <p>GNLP5014 has been removed.</p>

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		<p>will have a major impact.</p> <ul style="list-style-type: none"> - Lepus report states site is out of target area to access health services, schools and transport - Site assessment states 'there is currently no footpath on the local road'. Site is basically stuck under a flyover with no safe pedestrian access to anywhere - Incorrect data in SA document which casts doubts on quality and reliability - Amber assessment of services is an underestimate, schools and doctors are at capacity and there is no public transport from the site. Utilities are not readily available, has a capacity assessment been undertaken? Site floods on regular basis but assessment is green. Conclusion that 'compatibility with neighbouring uses' is green is not backed up with evidence. - Site assessment analysis has a number of inaccuracies suggesting that consideration has not been given to the constraints within the site. This is evident when reviewed alongside Lepus report. - HELAA assessment states unsuitable sites will be screened out but this has not been the case. Most green ratings given are not appropriate e.g. access, access to 		

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		services, utilities capacity/infrastructure, flood risk, market attractiveness, transport & roads and compatibility with neighbouring uses. The unsuitability of the site can be demonstrated by comparing with other discounted sites.		
		<p>Member of the public comments Site GNLP5022 Foulsham – (see site summary for general comments). No comments specific to site assessment</p>	<p>Response to public comments – Please see the responses under the site-specific representations.</p>	<p>See the updated site assessment information and policy</p>
		<p>Member of the public comments Site GNLP5009 Bawburgh – (see site summary for general comments). Comments specific to site assessment:</p> <ul style="list-style-type: none"> - SA impact survey summary is misleading as it shows pros/cons to either side like adding oranges and apples - Scoring for the site does not accurately reflect the significant constraints which cannot be mitigated. All categories should be red other than open space and GI which would adjust the overall assessment to 'unreasonable due to site constraints' 	<p>Response to public comments – Please see the responses under the site-specific representations.</p>	<p>GNLP5009 has been removed</p>

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		<p>- Report states that site is situated away from major sources of air and noise pollution but A47 is within short distance. Although site is 3km from River Wensum it is adjacent a richly inhabited water meadow. Report states site is within 600m of Bawburgh allotments and open space amenity, Bawburgh does not have any allotments are there is no publicly accessible amenity space at the location specified. Minor positive for primary school does not take into account that it is over subscribed. Statement about pedestrian access is incorrect, Bawburgh has a poor footpath and pavement network.</p>		
Sustainability Appraisal	20 (1 support, 19 object and 0 comments)	<p>Member of the public comments General comment: SA identifies merits or negatives of a site but no weighting is identified as to relative importance. Topics have been included which have not been assessed for any site e.g. crime and deprivation. Presenting information in this way dilutes and obfuscates the important differences in the cost/benefit analysis of each site being considered.</p>	<p>Response to public comments -- The Sustainability Appraisal (H4.1) has a range of 15 indicators covering social, economic and environmental factors. These are scored consistently against a set methodology. Outputs from the Sustainability Appraisal are then applied to the Site Assessment Information and used to select the most favourable sites of those</p>	Please see the updated Sustainability Appraisal H4.1 and H4.2

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			available; and, for unsuitable sites to be rejected on a consistent basis.	
		<p>Member of the public comments Site GNLP5014 North Burlingham – (see site summary for general comments). Comments specific to SA: - Unclear how assessment has concluded minor impact on air quality and noise given that site is located beside a busy main road. Would be dangerously high levels of air pollution and noise pollution. Report fails to analyse crime in any way – needs a separate addendum. Transport and access to services identified as minor negative however there is particularly poor pedestrian access from the site and crossing the A47 is a significant hazard. - Report appears to focus on environmental impact of the site but little attention given to major impact on locals e.g. strain on local services</p>	<p>Response to public comments -- Comments noted. Site GNLP5014 has been removed from the plan. Please see the site-specific responses for further information.</p>	<p>GNLP5014 has been removed</p>
		<p>Member of the public comments Site GNLP5009 Bawburgh – (see site summary for general comments). Comments specific to SA:</p>	<p>Response to public comments -- Comments noted. Site GNLP5009 has been removed from the plan.</p>	<p>GNLP5009 has been removed</p>

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		<p>- No sustainability benefits for this site, it will impact almost every aspect of life.</p> <p>- Proposed site is not within 1.5km of a secondary school, there is no secondary school which is accessible except by car. Primary school at capacity. Proposed site not near to hourly bus service as recommended. Proposed development will have adverse impact on heritage assets and their setting.</p> <p>- Scoring does not accurately reflect the location and impacts the proposed site will have. Climate, biodiversity, landscape, population/communities, health, transport, historic environment and water should all be scored double negative</p>	Please see the site-specific responses for further information.	
Habitats Regulations Assessment	8 (0 support, 7 Object, and 1 comment)	<p>Member of the public comments Site GNLP5014 North Burlingham – (see site summary for general comments). No comments specific to HRA.</p>	<p>Response to public comments -- Comments noted. Sites GNLP5014 and GNLP5009 have been removed from the plan. Please refer to the site-specific responses for further information.</p>	GNLP5014 has been removed. See updated HRA – H5.2
		<p>Member of the public comments</p>	<p>Response to public comments -- Comments noted. Sites</p>	GNLP5009 has been removed.

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		<p>Site GNLP5009 Bawburgh – (see site summary for general comments). Comments specific to HRA:</p> <ul style="list-style-type: none"> - Wildlife, including nesting birds, enjoy the meadow that this site will encroach on. Unacceptable - From the Habitats Regulations Assessment: A 2016 report by Yorkshire Wildlife Trust found that fly-tipping, antisocial behaviour and theft were greatest when there were traveller settlements within 100m. Bawburgh site is directly adjacent to a river valley nature area so this suggests that fly tipping and antisocial behaviour would increase. - From the Habitats Regulation Assessment: the proposed site would 'result in the loss of greenfield land and would be expected to contribute towards a cumulative loss of ecological habitat. This would be expected to lead to greater levels of habitat fragmentation and isolation for the local ecological network restricting the ability of ecological receptors to adapt to the effects of climate change'. 	<p>GNLP5014 and GNLP5009 have been removed from the plan. Please refer to site-specific responses for further information.</p>	<p>See updated HRA – H5.2</p>
TOTAL	660 (16 support,			

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	560 object and 84 Comments)			

Table 2 – Summary of Representations by G&T Site Reference and Council’s Response

GNLP5004 Land off Buxton Road, Eastgate, Cawston (4 Pitches)

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GNLP5004 Land off Buxton Road, Eastgate, Cawston (4 Pitches)	24 (0 Support, 21 object and 3 comment)	Cawston Parish Council – have received many representations from the small community near the site who feel that this proposal would have an overwhelmingly detrimental effect. Parish Council previously objected to housing proposal on site as it was not within defined development boundary, was not sustainable, did not provide proper access to services and facilities and did not meet criteria for a suitable ‘exception site’. Damage has been done to the site to make it look more suitable for development. Highway access from the site is unsuitable. Selection of site does not meet government guidance.	Response to Cawston Parish Council -- The dismissed appeal in October 2020 for a single dwelling on the land now promoted as GNLP5004 is noted but the context to its consideration as a Gypsy and Traveller site is different because the amount of land promoted through the local plan process for housing far exceeds what is required. By contrast far fewer landowners are willing to provide Gypsy and Travellers sites and so there are fewer sites to choose from. Of the sites promoted for Gypsies and Travellers GNLP5004 performs well. It is considered that mitigation can be put in place	No change

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			<p>for the great majority of the constraints identified. Examples, which are referenced in the site policy, are improving access into the site, additional landscaping, archaeological investigation, and measures to protect groundwater.</p> <p>The Parish Council's contention that GNLP5004 is not sustainable is noted but this does not mean its selection contradicts national guidance. National policy does not prevent sites in rural locations and as a smaller site for 4 pitches GNLP5004 would not dominate the surrounding settled community.</p>	
		<p>Marsham Parish Council – objects to the site on the ground of effects on biodiversity, SSSI 1 km away, 4 further SSSI within 5 km radius and green impact for Great Crested Newts. Also concerned about lack of pollution mitigation measures and loss of high-quality agricultural land.</p>	<p>Response to Marsham Parish Council -- The Site Assessment (H2.1) has considered the constraints to the site, the findings of the Habitats Regulations Assessment (H5.1), the Sustainability Appraisal (H4.1), and it takes account of consultation with Natural</p>	<p>No change</p>

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			<p>England. As a result, the policy for GNLP5004R requires additional landscaping and requires mitigation measures to protect groundwater.</p> <p>The constraints referred to by Marsham Parish Council about GNLP5004R to do with the possible presence of Great Crested Newts and loss of agricultural land are recognised but this site remains amongst the favoured options to meet the needs of Gypsies and Travellers. The loss of this small greenfield site is necessary because alternative brownfield sites are not available, and although the presence of Great Crested Newts is not entirely ruled out the ecological advice says they are sparsely populated in this location and there are less likely to be important pathways of connecting habitat for this species.</p>	

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		<p>Anglian Water – site is within reasonable distance to connect with water supply and water recycling networks.</p>	<p>Response to Anglia Water -- Comment noted</p>	<p>No change</p>
		<p>Historic England – recommends amendments with respects to policy requirement on archaeological assessment and landscaping wording suggested. Policy should make clear whether archaeological assessment should be desk based or field studies and any landscaping should be species appropriate to the local area.</p>	<p>Response to Historic England</p> <p>Comment noted, amend policy requirements as per HE comments and to support the NPPF para 194 to require that:</p> <p>(3) <u>A desk based archaeological assessment and, if necessary, a programme of archaeological fieldwork, prior to development</u></p> <p>Also, include the policy requirement: (2). Landscaping, including species appropriate to the local area, will be provided to enhance screening and to maintain the residential</p>	<p>Modify the site policy and supporting text requirements in response to Historic England’s representation</p>

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			amenity of adjoining properties.	
		<p>Member of the public comments</p> <ul style="list-style-type: none"> • No amenities, no public transport • Permission would not be given for new build dwellings • Drainage ditch in front of the land would be compromised to provide access • Potential for protected species on site, impact on ecology if hedgerow and trees need to be removed • Possible track of Roman Road • Highway safety due to farm vehicles and exit being near junction and bend – suitable visibility splay needed • No work available in the area • No services • Might be difficult to limit the number of pitches on the site • Who would be responsible for managing the site? • Disproportionate effect on surrounding community 	<p>Response to public comments</p> <p>– The points raised about the site have been considered, but GNLP5004 remains one of the favoured sites available. Issues like the access visibility splay or the ditch along the frontage are not considered to be issues that would prevent the site’s development.</p> <p>Whilst acknowledging the distance of GNLP5004 to local services, its location does not rule out its potential as a Gypsy and Traveller site. National policy does not prevent sites in rural locations and as a smaller site for 4 pitches GNLP5004 would not dominate the surrounding settled community.</p>	<p>A factual correction has been made to the site’s boundary and checked with the site promoter. The site boundary has been redrawn and the site has been re-referenced as GNLP5004R.</p>

Section of document / Document	Total Comment (Nos)	Summary of Representation by Organisation or Member of the public	Councils Response	Changes to Documents
		<ul style="list-style-type: none"> • Greenfield site close to existing homes, brownfield sites should take preference • Site has been damaged in an attempt to make it look more brownfield – hope Council takes action • Does not meet requirements for a rural exception site • SA supports view that this is not sustainable in terms of education, jobs, transport, pavements and local services but oddly says there will be a positive impact on transport and jobs which defies logic. • Site is unsustainable within terms of planning documents and appeals on the same/adjacent sites • Previous planning application for housing was rejected • Questions about size of site • Site intrusive and unattractive • Light pollution • Noise pollution 		

Section of document / Document	Total Comment (Nos)	Summary of Representation by Organisation or Member of the public	Councils Response	Changes to Documents
		<ul style="list-style-type: none"> • Land may be archaeologically important • Groundwater source protection zone • Site inappropriate in relation to government policy on traveller sites 		

GNLP5005 Land at Strayground Lane, Wymondham Recycling Centre (now referenced as GNLP5028 A and B)

Section of document / Document	Total Comment (Nos)	Summary of Representation by Organisation or Member of the public	Councils Response	Changes to Documents
GNLP5005 Land at Strayground Lane, Wymondham Recycling Centre (now referenced as GNLP5028 A and B)	10 (1 support, object and 8 comment)	Environment Agency – Comment: there is limited capacity at Wymondham Water Recycling Centre so would recommend constraints analysis is updated from green to amber for utilities capacity. A Flood Risk Activity Permit will be required for any development within 8m of the River Bays. There are also Environment Agency maintained assets bordering this river and this would be taken into account in any permit application. We would require a strip of land to be left close to the river for access and to avoid compromising the defences. This site is in Source Protection Zone 3 and is also on a principal aquifer. The site also overlies a historic landfill. This would trigger a consultation with us at the planning application stage and we would expect to see contaminated land risk assessment submitted as part of the application. The waste management licence on site should be surrendered when waste operations cease.	Response to Environment Agency – Agree: Amend site policy requirements as suggested.	Amend Site Policy requirements with regards to, river bank access and pollution mitigation measures to protect water quality due to proximity to source protection zone‘ included in G&T Topic paper (H3.1) The changes are shown in the G&T Topic Paper Appendix B: Site Assessment Update (May 2023) (H3.3)

Section of document / Document	Total Comment (Nos)	Summary of Representation by Organisation or Member of the public	Councils Response	Changes to Documents
		<p>Wymondham Town Council – Comment: Prospective sites 5005 and 5023 are adjacent to each other. To summarise the Town Council has made no decision on these proposals, other than to highlight that consideration should be taken into account when suitability assessments are made of the effect on the existing rural road network, and the potential to enhance the nearby wildlife sites and trails that are enjoyed by a considerable number of ramblers and walkers.</p>	<p>Response to Wymondham Town Council -- The comment is noted, and these issues will continue to be considered.</p>	<p>Due to highway constraints along Strayground Lane and at the junction of Whartons Lane with the B1172, GNLP5005 and GNLP5023 are now combined as a single allocation referenced GNLP5028 A and B.</p>
		<p>Wymondham Heritage Society – An ecological assessment would have to be carried out due to neighbouring County Wildlife Site. This proposal would be a missed opportunity to restore the waste site as part of the County Wildlife Site, which would be of enormous benefit to the town as a whole</p>	<p>Response to Wymondham Heritage Society and Green Wymondham – The proposal for a Gypsy and Traveller site along Strayground Lane is not in opposition to the aims of the Wymondham Heritage Society and Green Wymondham to create an ecological project and to link to the countryside. This is</p>	<p>No change</p>

Section of document / Document	Total Comment (Nos)	Summary of Representation by Organisation or Member of the public	Councils Response	Changes to Documents
		<p>Greening Wymondham – Land should be returned to nature as part of the Bays County Wildlife Site. Strayground Lane is an important and popular route for walkers and cyclists. It is part of the Green Ribbons Strategy outlined in the Neighbourhood Plan which is soon to be approved. Road is unsuitable for traffic. Reference to appeal</p>	<p>because the waste recycling centre is the main source of vehicle movements along Strayground Lane, and once it closes and is replaced by a Gypsy and Traveller site traffic will be much reduced and will make it better suited for walking and cycling. Redevelopment will assist as well in safeguarding trees and hedgerows, and for achieving 10% biodiversity net gain.</p>	
		<p>Historic England – No comment</p>	<p>Response to Historic England – Noted</p>	
		<p>Anglian Water – As referenced as part of the initial assessment, this site is within reasonable proximity to connect to our water supply network, but it is located outside the Wymondham water recycling catchment.</p>	<p>Response to Anglian Water – Comment noted</p>	
		<p>Member of the public comments</p> <ul style="list-style-type: none"> • Potential for pollution of Bays River and associated lowland fen areas (priority habitat) 	<p>Response to public comments</p> <p>-- The points raised about GNLP5005 have been considered, but this site remains</p>	

Section of document / Document	Total Comment (Nos)	Summary of Representation by Organisation or Member of the public	Councils Response	Changes to Documents
		<ul style="list-style-type: none"> • Reduced attractiveness of Strayground Lane as a walking route. Current footpath user numbers should be established. • Site unsuitable for travellers being remote from facilities and with restricted access. • Site already impacted by aggressive clearing detrimental to character of Bays River County Wildlife Site, opportunity to reinstate area as part of County Wildlife Site • There is Japanese knotweed on the edge of this site which needs to be treated as a matter of urgency • Support because it is a brownfield site and secluded by trees. This will minimise the impact on the local community and be pleasant surroundings for occupants. 	<p>amongst the favourable sites available. Of the sites promoted for Gypsies and Travellers it is near to facilities, such as a shop and primary school within walking distance.</p> <p>Constraints do exist but these can be mitigated, such as by investigations at the planning application stage into contamination and invasive species like Japanese Knotweed. The need for an ecological assessment is amongst the policy requirements.</p> <p>The proximity to the railway is acknowledged but this is not an issue that would prevent the site's development. This is confirmed, as Network Rail were consulted and raised no objection.</p> <p>Although the land is next to the River Bays, its development</p>	

Section of document / Document	Total Comment (Nos)	Summary of Representation by Organisation or Member of the public	Councils Response	Changes to Documents
			<p>need not significantly affect the river or surrounding habitat, and development offers the potential for increased landscaping as well as achieving a 10% Biodiversity Net Gain. GNLP5005 is previously developed, so its re-use would be beneficial.</p> <p>The use of Strayground Lane by walkers to gain access into the wider countryside is acknowledged and this proposal does not alter that. Access for pedestrians along Strayground Lane is also expected to be improved once the recycling centre closes because traffic volumes are likely to reduce.</p>	

GNLP5009 Land off Hockering Lane, Bawburgh (WITHDRAWN)

Section of document / Document	Total Comment (Nos)	Summary of Representation by Organisation or Member of the public	Councils Response	Changes to Documents
GNLP5009 Land off Hockering Lane, Bawburgh (WITHDRAWN)	130 (0 support, 122 objections and 8 comments)	<p>Historic England – recommends that a Heritage Impact Assessment should be prepared to inform the suitability of the site and the policy wording. Recommends amendments with respect of policy requirement on archaeological assessment and amended wording suggested. Policy should make clear whether archaeological assessment should be desk based or field studies. Also recommends additional criterion re: trees and hedgerows and wording suggested.</p>	<p>Response to all comments received -- Significant opposition was expressed to site GNLP5009 through the public consultation from nearby residents. Amongst other issues, the highway implications for Hockering Lane were raised as a particular area of concern. Following the public consultation, the landowner has decided to withdraw the site from the local plan process, meaning that it is no longer an achievable allocation.</p>	<p>Remove site GNLP5009 from the Site Allocations Policies contained in G&T Topic Paper (H3.1) as it is no longer available.</p>
		<p>Anglian Water – The site is located close to existing development within the settlement and within a reasonable distance to connect to our water supply and water recycling networks</p>		
		<p>Wheatman Planning Ltd. Objection as the access road and junction are not suitable to accommodate additional</p>		

Section of document / Document	Total Comment (Nos)	Summary of Representation by Organisation or Member of the public	Councils Response	Changes to Documents
		<p>traffic and access involves land owned by a third party. Impact on residential amenity of existing properties. Building Proximity distance to gas pipeline, Minor adverse impacts in SA should be reclassified as major adverse impacts, leading to a recommendation that the site is not a preferred allocation.</p> <p>Magnus Magnusson acting on behalf of client – Site wholly unsuitable for inclusion and an alternative site should be sought, the reserve site utilised or an uplift in pitch numbers sought on other sites. Supporting document highlights a host of potential constraints and impacts a number of which are ‘showstoppers’ in terms of assessing the deliverability of the site to come forward within the plan period.</p> <p>Local Councillors Phil Hardy, David Bills and Adrian Dearnley – Undeveloped countryside afforded protection from development in local and national policies. Visibility splays cannot</p>		

Section of document / Document	Total Comment (Nos)	Summary of Representation by Organisation or Member of the public	Councils Response	Changes to Documents
		<p>be achieved driving out of Hockering Lane. Hockering Lane is narrow and mature trees would potentially be affected by any road widening scheme.</p> <p>Member of the public comments</p> <ul style="list-style-type: none"> • Close proximity to school, danger to children, school at capacity • Narrow road, cul de-sac, congested particularly at school time, unlit and not suitable for large vehicles e.g. emergency services • Site requires access over a private right of way • Access to garages needs to be maintained • Increased traffic • Vulnerable and elderly people and families with small children • Loss of privacy • Existing residential area, only site proposed within a village • Use transit site at Long Lane, existing facilities and infrastructure • Adjacent water meadow used for recreation 		

Section of document / Document	Total Comment (Nos)	Summary of Representation by Organisation or Member of the public	Councils Response	Changes to Documents
		<ul style="list-style-type: none"> • Impact on river valley • Limited local amenities and public transport • Gas main, concern about fire risk, how will exclusion zone be enforced? • Abundance of wildlife • Close proximity to conservation area • Numerous travellers sites in area • Greenfield Site should be protected • Drainage issues • Existing sewerage infrastructure is inadequate • Dangerous bridge in centre of village, protected as monument • Noise pollution both from residents of the site and for residents of the site from the A47 Southern Bypass • Water pollution of nearby river • Management of site • Concerns about layout, density and design of development e.g. potential for 24 individual trailers in small space • Flooding & Drainage issues • Would proposal submitted by private individual be considered 		

Section of document / Document	Total Comment (Nos)	Summary of Representation by Organisation or Member of the public	Councils Response	Changes to Documents
		<ul style="list-style-type: none"> • The approach to selecting sites on the basis of them being promoted is unsound and unsustainable – should be a better distribution of sites • Concern that this site has same landowner as site in South Norfolk Village Clusters Plan • Negative experiences of nearby sites with unlawful and antisocial behaviour, cost of clean up • Concern about decline in property values • Site unanimously rejected by local residents at public meeting in February • Other more suitable sites 		

GNLP5014 Land adjacent to A47 North Burlingham Junction (WITHDRAWN)

Section of document / Document	Total Comment (Nos)	Summary of Representation by Organisation or Member of the public	Councils Response	Changes to Documents
GNLP5014 Land adjacent to A47 North Burlingham Junction (WITHDRAWN)	288 (0 support, 270 objections and 18 comments)	<p>National Highway – objects as through DCO the land is to be part of environmental mitigation and will include attenuation ponds. Therefore, the site is not available.</p>	<p>Response to National Highways – Comment noted, update site assessment, remove the site allocation, ensure sufficient sites are allocated to meet the need for G&T.</p>	Remove site GNLP5014 from the Site Allocations Policies contained in G&T Topic Paper (H3.1) as the site is no longer available.
		<p>Anglian Water – The site is located within reasonable proximity to connect to our water supply network, but due to its rural location it is not within reasonable distance of our water recycling network catchments. The A47 road improvement scheme will require the diversion of our assets at this location and this should be a consideration for future connections.</p>	<p>Response to all other comments – Significant opposition was expressed to site GNLP5014 through the public consultation. Significantly, National Highways responded to the consultation stating that all the land identified as a potential broad location for a Gypsy and Traveller accommodation is now required for landscaping and drainage improvements associated to the Blofield to North Burlingham A47 road improvement scheme. The site</p>	
		<p>Historic England – We welcome bullet point 3 in relation to landscaping to protect views of non-designated heritage assets nearby.</p>		

Section of document / Document	Total Comment (Nos)	Summary of Representation by Organisation or Member of the public	Councils Response	Changes to Documents
		<p>Environment Agency –The site does not appear to have access to mains drainage. Therefore, there is a need for private means of foul drainage, e.g. septic tanks, etc. See PPG para 020 on hierarchy guidance. Amend site assessment under ‘Utilities infrastructure ‘from green to amber’.</p>	<p>has therefore been withdrawn from the local plan process.</p> <p>The GNLP has conducted an extensive search for sites, by engaging with private landowners, public sector organisations and speaking to the Gypsy and Traveller community. Possible sites at Postwick were investigated but none of the landowners in this area were willing to make land available.</p> <p>Every effort is made to make the website clear and user-friendly, and the Greater Norwich authorities employs a specialist website company to assist. This company specialises in websites for local councils who are writing local plans, and serves many local authorities across the country. Running consultations online is the most efficient and effective way to let people have their say, but paper</p>	
<p>Lingwood and Burlingham Parish Council – significant concerns notably accessibility to services, danger to children and animals and noise pollution. There are no pavements or cycleways so journeys would be predominantly by car. National Highways have earmarked the area for drainage to the improved A47, no mains sewers, loss of grade 1 agricultural land, flooding, landscape impact, pressure on local services.</p>	<p>Strumpshaw Parish Council objects to site, completely unsuitable location for families to live, concern about overcrowding and impact on services and facilities, road is hazard to children and animals, no connection to sewage</p>			

Section of document / Document	Total Comment (Nos)	Summary of Representation by Organisation or Member of the public	Councils Response	Changes to Documents
		<p>infrastructure, noise and potential health issues, flood risk.</p> <p>Reedham Parish Council -- Objection. Location near to a main dual carriageway will subject residents to unacceptable air and noise pollution. No safe pedestrian access to services and facilities. No main sewage. Site dependent on new dual carriageway which does not yet have planning permission.</p> <p>Beighton Parish Council – Objection: The Parish held a public meeting and in which about 70 Parishioners mentioned they had only discovered the consultation in the press, national policy state that LPA should pay attention to early and effective community engagement with both settled and traveller communities. Has there been direct consultation with the traveller community to assess their needs. The site is in the middle of nowhere with nothing within walking distance and it would lead to pressure on the amenities available in Acle. Concern about increase in crime, safety of</p>	<p>response forms were also available for those that preferred to use the post. Members of the GNLP team were also available to assist with queries by telephone.</p> <p>The GNLP has conducted an extensive search for sites, by engaging with private landowners, public sector organisations and speaking to the Gypsy and Traveller community. Possible sites at Postwick were investigated but none of the landowners in this area were willing to make land available.</p>	

Section of document / Document	Total Comment (Nos)	Summary of Representation by Organisation or Member of the public	Councils Response	Changes to Documents
		<p>occupants due to proximity to the road and the use of grade 1 agricultural land.</p> <p>South Walsham Parish Council – concern that existing infrastructure is at breaking point, impact of living so close to a main road, destruction of local habitat, lack of services/utilities, integration of residents into local community, management and financing of site, loss of farmland, lack of pedestrian access and footpaths.</p> <p>National Farmers Union- objection on behalf of the Farmers and members in the proximity of this site who have expressed concerns about the scale and size of the site and accessibility to services. The site should be limited single figure numbers ideally no more than 6 pitches. Thought the site itself is inappropriate due to proximity to major road, danger for children, air pollution even if it was included in the road scheme. Inappropriate to use grade 1 agricultural land, even if the building of the road makes it impractical to farm then</p>		

Section of document / Document	Total Comment (Nos)	Summary of Representation by Organisation or Member of the public	Councils Response	Changes to Documents
		<p>the land should be given over to environmental use. Site is remote from existing infrastructure and there is no footpath network.</p> <p>Cllr. Lana Hempsall – Object – stated has grave concerns about the site as it is proposed for two attenuation basins associated with A47 improvements. The site is close to major road, limited natural light and high levels of air and noise pollution. Pressure on local services, lack of engagement with the G&T community, lack of utilities, flooding. Postwick Park & Ride should be used. Requested Public Meeting 7 March– approximately .400 people and GNLP staff attended.</p> <p>Burlingham Bowls Club – The site is on greenfield land and it is isolated without footpaths, to any town or village to access services and facilities. There are no utilities which would have to be provided at some cost. Highways England have earmarked the site for surface water balancing ponds for the A47 improvements. The site will be</p>		

Section of document / Document	Total Comment (Nos)	Summary of Representation by Organisation or Member of the public	Councils Response	Changes to Documents
		<p>noisy and not an attractive place to live. Postwick Park & Ride should be considered instead.</p> <hr/> <p>Member of the public comments (including comments submitted by local councillors on behalf of residents who wish to stay anonymous)</p> <ul style="list-style-type: none"> • Site would not be considered appropriate for permanent residential buildings so why is it appropriate for travellers • Site will be an unpleasant place to live. Impact on health both mental and physical • Busy junction, accident blackspot. Dangerous for children and animals • Road will be busier and faster once dualled • New road layout will surround this site • Volume of sugar beet lorries in season 		

Section of document / Document	Total Comment (Nos)	Summary of Representation by Organisation or Member of the public	Councils Response	Changes to Documents
		<ul style="list-style-type: none"> • Not walking distance to services and facilities, no footpaths, residents would be forced to use cars • Pressure on local services and facilities, doctors, schools, dentists etc at capacity • Provision of utilities such as water and sewage infrastructure • Noise pollution • Light pollution • Waste management, refuse collection, fly tipping • Potential increase in crime rates • Would overwhelm the local population • Would spoil the rural beauty and environment, landscape impact • Drainage issues • Grade 1 Agricultural land needed for food production • Greenfield land • Loss of wildlife habitat • Close to the Broads, impact on habitats, economy and tourism • Felling of mature trees • Lack of employment opportunities • Effect on house prices 		

Section of document / Document	Total Comment (Nos)	Summary of Representation by Organisation or Member of the public	Councils Response	Changes to Documents
		<ul style="list-style-type: none"> • Fear of antisocial behaviour • High Court challenge – will impact deliverability • Flood risk • Area identified as drainage lagoons by National Highways • Consultation not compliant with SCI. Local people not aware of consultation • Website difficult to navigate • Objections voiced at public meeting • Inaccurate and out of date data in SA • Alternative sites available. • Postwick Park & Ride should be investigated • Does not meet government guidance in 'planning policy for travellers sites' • Cost to the taxpayer of providing adequate infrastructure • Proposal lacking in detail • Backwards step in relation to climate change and net zero 		

GNLP5019 Land north of Shortthorn Road, Stratton Strawless (8 additional pitches)

Section of document / Document	Total Comment (Nos)	Summary of Representation by Organisation or Member of the public	Councils Response	Changes to Documents
GNLP5019 Land north of Shortthorn Road, Stratton Strawless (8 additional pitches)	5 (2 support, 0 object and 3 comment)	<p>Environment Agency – The site does not appear to have access to mains drainage. Therefore, there is a need for private means of foul drainage, e.g., septic tanks, etc. See PPG para 020. Change site assessment Utilities infrastructure from green to amber.</p>	<p>Response to Environment Agency and Anglian Water -- This site currently comprises 9 pitches and a community building. The proposal is to submit a revised scheme for 8 pitches on an area of land that has been granted permission for 4 pitches. The proposal would expand the site to a total of 17 pitches. Therefore, it is likely that the continued use of septic tanks will be required at the planning application stage.</p>	No change
		<p>Anglian Water – The site is located within reasonable proximity to connect to our water supply network, and is adjacent to the Aylsham water recycling catchment, although this part of the network operates as a vacuum sewer system which can take up to 24 months for a connection due to the requirements to assess the capacity of the network. We would suggest that any policy should include a requirement for early engagement with Anglian Water regarding connection to our water recycling network.</p>		
		<p>Historic England – No comments</p>		

Section of document / Document	Total Comment (Nos)	Summary of Representation by Organisation or Member of the public	Councils Response	Changes to Documents
		<p>Summary of member of the public comments</p> <ul style="list-style-type: none"> • Support for site as the most cost-effective way of providing additional pitches and limit impact and disruption to the settled communities. 	<p>Response to public comments – Support noted</p>	

GNLP5020 Romany Meadow, The Turnpike, Carleton Rode (6 additional pitches)

Section of document / Document	Total Comment (Nos)	Summary of Representation by Organisation or Member of the public	Councils Response	Changes to Documents
GNLP5020 Romany Meadow, The Turnpike, Carleton Rode (6 additional pitches)	8 (3 support, 1 objection, 4 comments)	<p>Environment Agency –The site does not appear to have access to mains drainage. Therefore, there is a need for private means of foul drainage, e.g. septic tanks, etc. See PPG para 020. Change site assessment Utilities infrastructure from green to amber.</p>	<p>Response to Environment Agency and Anglian Water – The proposal will increase to 12 pitches from the total of 8 already permitted, therefore the continued use of septic tanks is likely to be required at the planning application stage.</p>	No change
		<p>Anglian Water – The site is located within reasonable proximity to connect to our water supply network, but due to its rural location, it is not within reasonable distance of our water recycling network catchments.</p>		
		<p>Historic England – Whilst there are no designated heritage assets within the site, there are several grade II listed buildings nearby including The Ashes to the east and a cluster of grade II properties to the northwest. However, the site is quite well contained and intervening landscaping should limit the impact on the historic environment.</p>	<p>Response to Historic England – comment noted</p>	

Section of document / Document	Total Comment (Nos)	Summary of Representation by Organisation or Member of the public	Councils Response	Changes to Documents
		<p>We welcome bullet point 4 in relation to 'landscaping to protect views of nearby listed buildings.</p> <p>Carleton Rode Parish Council – Objection -due to size and scale of the development disproportionate to the size of the village and the services that the Carleton Rode and New Buckenham provide. This is 100% increase in the size of the development which is not acceptable.</p> <ul style="list-style-type: none"> • The location of the site, outside the development boundary means that there is no access to shops, schools or public transport without using vehicles. • Flood concerns from increasing the hard standing area at the site, increasing water runoff and pollution risk from the site. • Highways access concerns, though access is stated as being through the existing site we have concerns that the gateway onto the proposed new site has already been improved and would be used to allow 2 self-contained sites. 	<p>Carleton Rode Parish Council -- The proposals could increase the site at Upgate Street (GNLP5024) to 6 pitches and the site at Romany Meadows (GNLP5020) to 12 pitches from the total of 8 already permitted. However, impacts such as vehicle movement on the highway network or visual intrusion into the countryside landscape have not been assessed to be significant. The risk of harm will also be mitigated by the inclusion of policy criteria, such as for additional tree planting to preserve landscape setting.</p> <p>Both the Carleton Rode sites are well-established, are not growing beyond a scale where management will become a concern, and they perform well</p>	

Section of document / Document	Total Comment (Nos)	Summary of Representation by Organisation or Member of the public	Councils Response	Changes to Documents
		<ul style="list-style-type: none"> • Exposed site. The site stands out in the landscape. Screen planting would be required. • At the time of the original application in 2009 there were a lot of objections to the site from the local community, concerns were raised at the time over the size of the site and the possible expansion of the site if it were passed. South Norfolk Council were supporting small family run independent sites, over the years this site has changed from just being a family site to being accessible to all from the Gypsy and Traveller Community run by an independent family, this can be a difficult situation to control and concerns the Parish. • The increase at this site along with the expansion at Upgate Street GNLP5024 would increase the number of Traveller Pitches by 10 which is disproportionate to the size and development of the village. 	<p>against the site assessment criteria. There are some constraints, such as flood risk and the distance to local facilities, but GNLP5020 and GNLP5024 remain amongst the best performing sites that have been promoted for meeting the need for 30 additional pitches by March 2027.</p>	
		<p>Support for site from landowner</p>	<p>Response to landowner – The site’s continued promotion is noted</p>	

GNLP5021 Land at the Old Produce Shop, Holt Road, Horsford (WITHDRAWN)

Section of document / Document	Total Comment (Nos)	Summary of Representation by Organisation or Member of the public	Councils' Response	Changes to Documents
GNLP5021 Land at the Old Produce Shop, Holt Road, Horsford (WITHDRAWN)	6 Overall (4 comments, 2, objections 0 support	<p>Environment Agency –The site does not appear to have access to mains drainage. Therefore, there is a need for private means of foul drainage, e.g., septic tanks, etc. See PPG para 020. Change site assessment Utilities infrastructure from green to amber’.</p>	<p>Response to comments received -- Some opposition was expressed to site GNLP5021 through the public consultation. Following the consultation, the landowner has reconsidered the site’s promotion and has decided to withdraw it from the local plan process, meaning that it is no longer an achievable allocation. The landowner’s decision was partly based on comments posted on social media and concerns raised locally.</p>	Remove site GNLP5021 from the Site Allocations Policies contained in G&T Topic Paper (H3.1) as it is no longer available.
		<p>Norwich Airport – objects on the grounds of potential noise and disturbance to residents from offshore helicopter traffic. Noise already reported at Stratton Strawless. This site is not suitable for gypsy and traveller pitches given the poor acoustic performance of mobile homes. No insertion of acoustic fencing will compensate for the impacts</p>		
		<p>Anglian Water – This site is located within reasonable proximity to connect to our water supply network but due to its rural location it is not within reasonable distance of our water recycling network</p>		

Section of document / Document	Total Comment (Nos)	Summary of Representation by Organisation or Member of the public	Councils' Response	Changes to Documents
		<p>catchments. There is a mains water pipe to the northern boundary of the site. We will require sufficient stand-off distances around the water main or diversion at the developers cost and to the satisfaction of Anglian Water.</p> <p>Historic England – No comments</p> <p>Member of the public comments</p> <ul style="list-style-type: none"> • Existing problems with speeding cars and rubbish • How to ensure that no more than 6 groups of people live there • Village infrastructure at breaking point • Concern about useability of local footpath near site 		

GNLP5022 Land at the Oaks, south-east of Letter Box Cottage, Reepham Road, Foulsham (5 additional pitches)

Section of document / Document	Total Comment (Nos)	Summary of Representation by Organisation or Member of the public	Councils Response	Changes to Documents
GNLP5022 Land at the Oaks, south-east of Letter Box Cottage, Reepham Road, Foulsham (5 additional pitches)	9 (0 support, 6 object, 3 comments)	<p>National Gas Transmission – The site is crossed by or in close proximity to National Gas Transmission Assets. Information submitted outlining guidance on development close to National Gas Transmission infrastructure</p>	<p>Response to National Gas Transmission, Anglian Water, and Historic England -- Comments noted. The site is an existing G&T Site with planning permission, the site constraints have been identified through the site assessment as a result, the site policy requirements take the location of the gas pipe into account in terms of the proposed layout of the development and further consultation requirements at the planning application stage with the relevant bodies.</p>	No change
		<p>Anglian Water – The site is located within reasonable proximity to connect to our water supply network but due to its rural location it is not within reasonable distance of our water recycling network catchments</p>		
		<p>Historic England – consider any impact on designated heritage assets would be minimal. Welcome bullet point 4 in relation to landscaping to protect views of nearby listed buildings</p>		

		<p>Foulsham Parish Council – objects due to concerns over waste disposal, site was meant to be only for fixed period of time, site is outside of settlement limit and not suitable for further occupation. There are already 3 traveller sites in the vicinity which is disproportionate for a small village.</p> <p>Themelthorpe Parish Group – to increase the number of pitches would make the scale of The Oaks too large for such a small village will no amenities and out of keeping with this quiet, rural area. Detrimental impact on local landscape. The number of buildings now on the site is greatly in excess of the number allowed under the granted planning permission. An unauthorised access road has been added with a very high fence. Major concerns regarding transport suitability and accessibility, issues with speeding, no street lighting and no footpaths. Concerned about provisions for sewage and risk of increased flooding. What provision is being made for nutrient neutrality? Concern about gas pipe running across the site. Noise pollution, antisocial behaviour and adverse impacts on biodiversity</p>	<p>Response to Foulsham Parish Council and Themelthorpe Parish Group – The Oaks is an established site, with permanent planning permission for 2 pitches, and investigations are taking place to ensure all development that has taken place on the site has been regularised. The owner is now willing to provide more pitches, and the site performs well against the site assessment criteria. There are some constraints, such as some flood risk and the absence of footpaths to local facilities. Nevertheless, the Oaks (GNLP5022) remains one of the best performing sites amongst those that have been promoted for meeting the need for 30 additional pitches by March 2027.</p>	
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Section of document / Document	Total Comment (Nos)	Summary of Representation by Organisation or Member of the public	Councils Response	Changes to Documents
		<p>Hawk and Owl Trust – Our land adjacent to the proposed site is part of a local community woodland initiative. Since the land has been gifted to the Trust we have suffered over £5,000 of damage including cut fence posts and illegal dumping of waste.</p>	<p>Response to Hawk and Owl Trust -- This response implies some association with criminal activity and the presence of a nearby Gypsy and Traveller site.</p> <p>The site assessment information explains the criteria used for assessing the various Gypsy and Traveller sites, but there is no criteria for whether the site is associated with criminal activity.</p> <p>To do so would be unfair and discriminatory as it could penalise someone the opportunity for accommodation based on the actions or alleged actions of someone else.</p>	

GNLP5023 Land off Strayground Lane, Wymondham (now GNLP5028 A and B)

Section of document / Document	Total Comment (Nos)	Summary of Representation by Organisation or Member of the public	Councils Response	Changes to Documents
GNLP5023 Land off Strayground Lane, Wymondham (now GNLP5028 A and B)	10 (0 support, 4 object, 6 comments)	<p>Environment Agency – There is limited capacity at Wymondham Water Recycling Centre so would recommend constraints analysis is updated from green to amber for utilities capacity. A Flood Risk Activity Permit will be required for any development within 8m of the River Bays. There are also Environment Agency maintained assets bordering this river and this would be taken into account in any permit application. We would require a strip of land to be left close to the river for access and to avoid compromising the defences. This site is in Source Protection Zone 3 and is also on a principal aquifer. The site also overlies a historic landfill. This would trigger a consultation with us at the planning application stage and we would expect to see contaminated land risk assessment submitted as part of the application. The waste management licence on site should be surrendered when waste operations cease.</p>	<p>Response to Environment Agency Agree, refer to Site GNLP50028 which includes former GNLP5023 and GNLP5005. The policy wording suggested has been worked into site policy requirements with regard to providing an access to the adjacent river to allow maintenance of the watercourse and ensuring development of the site does not compromise nearby flood defences.</p>	<p>Amend Site Policy requirements with respect to providing access to River Bays and protection of river defences contained in G&T Topic Paper (H3.1)</p>

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		<p>Historic England – The SA states that the policy could be further improved by detailed requirements to consider landscaping measures to reduce potential for adverse effects on the surrounding landscape character. Policy wording suggested.</p> <p><i><u>Landscaping measures to reduce potential for adverse effects on the surrounding landscape character</u></i></p>	<p>Response to Historic England – Agree refer to Site GNLP50028 which includes former GNLP5023 and GNLP5005. See amendments made to Site Policies requirements as suggested The changes are shown in G&T Topic Paper Appendix B: G&T Assessment update May 2023 (H3.3)</p> <p>5. Landscape screening will be required <u>at the site boundaries</u> to the neighbouring paving company protect residential amenity and landscape character’</p>	Amend site policy requirements as stated.
		<p>Anglian Water – The site is located within a reasonable proximity to connect to our water supply network but due to its rural location it is not within reasonable distance of our water recycling network catchments.</p>	<p>Response to Anglian Water -- Comment noted as with other sites in similar position, the use of septic tanks is likely to be required at the planning application stage.</p>	No change
		<p>Wymondham Town Council – Prospective sites 5005 and 5023 are adjacent to each other. To summarise the Town Council has made no decision on</p>	<p>Response to Wymondham Town Council -- The comment is noted, and these issues will continue to be considered.</p>	Due to highway constraints along Strayground

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		<p>these proposals, other than to highlight that consideration should be taken into account when suitability assessments are made of the effect on the existing rural road network, and the potential to enhance the nearby wildlife sites and trails that are enjoyed by a considerable number of ramblers and walkers.</p>		<p>Lane and at the junction of Whartons Lane with the B1172, GNLP5005 and GNLP5023 are now combined as a single allocation referenced GNLP5028 A and B.</p>
		<p>Wymondham Heritage Society – It is hoped that this County Wildlife Site might be part of another Claylands Project, linking the Town centre to the open countryside beyond as it is a unique site for wildlife, flora and fauna to be enjoyed by generations of walkers.</p>	<p>Response to Wymondham Heritage Society and Greening – Wymondham. The proposal for a Gypsy and Traveller site along Straground Lane is not in opposition to the aims of the Wymondham Heritage Society and Green Wymondham to create an ecological project and to link to the countryside. The policy requirements support the protection of the county wildlife site and ecological assessments to identify any potential impacts. Also, the waste recycling centre is</p>	<p>No change</p>
		<p>Greening Wymondham – objection is not concerned with the use of the site by travellers but with making sure the site does not generate future traffic movements and that the peaceful tranquillity and sense of history of the lane is preserved and</p>		

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		<p>enhanced. The site should be restored to nature as part of the Bays River County Wildlife Site for general public enjoyment and that the importance of the lane as part of a primary walking route from the urban environment to open countryside is preserved and enhanced.</p>	<p>the main source of vehicle movements along Strayground Lane, and once it closes and is replaced by a Gypsy and Traveller site traffic will be much reduced and will make it better suited for walking and cycling. Redevelopment will assist as well in safeguarding trees and hedgerows, and for achieving 10% biodiversity net gain.</p>	
		<p>Member of the public comments</p> <ul style="list-style-type: none"> • Recent and historic contamination • Close proximity to railway crossing and large pond • Are Network Rail aware in case further mitigation to ensure the safety of the crossing is needed • Site should revert to nature once the recycling centre has relocated and the public byway maintained for leisure purposes as Wymondham is rapidly expanding and such opportunities are diminishing • Not enough doctors/school places/dentists to meet demand • Japanese Knotwood present 	<p>Response to public comments –</p> <p>The points raised about GNLP5023 have been considered, but this site remains amongst the favourable sites available. Of the sites promoted for Gypsies and Travellers, it is the nearest to facilities such as a shop and primary school which are within easy walking distance.</p> <p>Constraints do exist but these can be mitigated, such as by investigations at the planning application stage into contamination and invasive species like Japanese Knotweed.</p>	

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		<ul style="list-style-type: none"> • Access issues will need to be resolved and be cost appropriate for two pitches • The river impact needs to be assessed • Potential for pollution of Bays River and associated lowland fen areas (priority habitat) • Reduced attractiveness of Strayground Lane as a walking route. Current footpath user numbers should be established. 	<p>Amongst the policy requirements too is the need for an ecological assessment.</p> <p>The proximity to the railway is acknowledged but this is not an issue that would prevent the site's development. This is confirmed, as Network Rail were consulted and raised no objection.</p> <p>Although the land is next to the River Bays its development need not significantly affect the river or surrounding habitat, and opportunity for development offers the potential for increased landscaping as well as achieving a 10% Biodiversity Net Gain.</p> <p>The use of Strayground Lane by walkers to gain access into the wider countryside is acknowledged and this proposal does not alter that. Access for pedestrians along Strayground Lane is also expected to improve once the recycling</p>	

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			centre closes because traffic volumes are likely to reduce.	

GNLP5024 Land off Ugate Street, Carleton Rode (4 additional pitches)

Section of document / Document	Total Comment (Nos)	Summary of Representation by Organisation or Member of the public	Councils Response	Changes to Documents
GNLP5024 Land off Ugate Street, Carleton Rode (4 additional pitches)	7 (3 support, 1 object, 3 comments)	Environment Agency –The site does not appear to have access to mains drainage. Therefore, there is a need for private means of foul drainage, e.g., septic tanks, etc. See PPG para 020.Change site assessment Utilities infrastructure from green to amber’.	Response to Environment Agency and Anglian Water -- Comment noted, this is an existing Gypsy and Traveller site which currently comprises 2 pitches with planning permission and the proposal is to expand within the current curtilage of the site by 4 pitches to grow the site to a total of 6 pitches. Therefore, it is considered that this can be achieved as previous permission with continued use of septic tank as part of the planning application process.	Amend the policy and
		Anglian Water – This site does not appear to be in close proximity to a water supply connection or our water recycling network. As the neighbouring site is occupied and was granted planning permission in 2010, there is an assumption that a water supply is available and sewerage treatment is confirmed as a package treatment plant through the documents submitted with the planning application.		
		Historic England – The site assessment states that Bunns Bank Linear Earthwork, which elsewhere in its course is scheduled,	Response to Historic England -- Comment noted, the site is approximately 230 metres away	

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		<p>is adjacent to the site and should be taken into consideration. Therefore, they suggest an additional bullet point to ~Protect the adjacent Bunns Bank Linear Earthwork.</p>	<p>from entry 57351 possible fragment of Bunn's Bank linear earthwork. Therefore, include a reference in the supporting text:</p> <p>'A possible fragment of the scheduled monument Bunn's Bank linear earthwork is approximately 230 metres from the site. Therefore, an archaeological assessment is required prior to development.'</p> <p>Also add a policy requirement 4. 'To protect the Bunn's Bank linear earthwork an archaeological assessment will be required prior to development'</p>	<p>supporting text as stated</p>
		<p>Carleton Rode Parish Council – Size and scale is disproportionate to size of village and its services. A 200% increase in size of development is not acceptable. Location of site outside development boundary means there is no access to shops, services or public transport. There are highway access concerns. It is an exposed site which stands out in the</p>	<p>Response to Carleton Rode Parish Council –</p> <p>The proposals could increase the site at Upgate Street (GNLP5024) to 6 pitches and the site at Romany Meadows (GNLP5020) to 12 pitches from the total of 6 already permitted, but impacts such as vehicle movement on the</p>	

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		<p>landscape. Screening would be required. The combination with site GNLP5020 would be disproportionate.</p>	<p>highway network or visual intrusion into the countryside landscape have not been assessed as being significant. The risk of harm will also be mitigated by the inclusion of policy criteria, such as for additional tree planting to preserve landscape setting.</p> <p>Both the Carleton Rode sites are well-established, are not growing beyond a scale where management will become a concern, and they perform well against the site assessment criteria. There are some constraints, such as some flood risk and the distance to local facilities, but GNLP5020 and GNLP5024 remain amongst the best performing sites that have been promoted for meeting the need for 30 additional pitches by March 2027.</p>	
		<p>Member of the public comments Support for site</p>	<p>Response to public comments -- Support noted</p>	

GNLP5013 Land at Ketteringham Depot (10 pitches)

Section of document / Document	Total Comment (Nos)	Summary of Representation by Organisation or Member of the public	Councils Response	Changes to Documents
GNLP5013 Land at Ketteringham Depot (10 pitches)	3 comments	<p>Anglian Water – Comment as a reasonable alternative site, Anglian Water notes that the site is located within reasonable proximity to connect to our water supply network, but it is not within reasonable distance of our water recycling network catchments.</p>	<p>Response to Anglia Water -- Comment noted. As with similar sites, the use of septic tanks will be a consideration as part of the planning application process.</p>	No change
		<p>Historic England – Whilst there are no designated heritage assets within the site boundary, there are two round barrows (scheduled monuments) to the south of the site and several grade II listed buildings nearby. However, these are all over 500 metres from the site. Given the distance and intervening vegetation, we consider there would be little impact on designated heritage.</p>	<p>Response to Historic England -- Comment noted</p>	

VCHAP GT Site 1 and Site 2

Section of document / Document	Total Comment (Nos)	Summary of Representation by Organisation or Member of the public	Councils Response	Changes to Documents
VCHAP GT Site 1 VCHAP GT Site 2	comment	Anglian Water -Comment - notes the constraints identified regarding these sites and reasons why they have not been brought forward. In terms of access to our water supply and water recycling networks we can state that these sites are located within reasonable proximity to connect to our water supply network, but due to the rural location of these sites, they are not within reasonable distance to connect to our water recycling network catchments.	Response to Anglian Water -- Comment noted	No change

VCHAP 3 Sites at Denton, Middle Road SOUTH NORFOLK

Section of document / Document	Total Comment (Nos)	Summary of Representation by Organisation or Member of the public	Councils Response	Changes to Documents
VCHAP 3 Sites at Denton, Middle Road SOUTH NORFOLK	0	No comments		