

## **GNLP Gypsy and Travellers Sites Additional Focussed Consultation (5<sup>th</sup> June – 3<sup>rd</sup> July 2023) Summary of Comments and GNLP'S Responses**

### **Number of Responses**

21 comments were received from 16 respondents on the 3 site proposals:

- **GNLP5025** Woodyard, Reepham Road, Foulsham (2 additional G&T pitches to the 2 existing) - 6 support the omission of the site, 1 object
- **GNLP5026** Land off Peddlars Turnpike, Guestwick Green (3 new G&T pitches) - 7 support the omission of the site, 1 object
- **GNLP5027** Brick Kiln Road, Hevingham (5 additional pitches to the 1 existing) - 3 object to the inclusion of the site, 2 support, and 1 comment

In addition to these comments, the Environment Agency and National Highways replied to say they had no comments to make.

**Comments on GNLP5025 Woodyard, Reepham Road, Foulsham (2 additional G&T pitches)**

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<p><b>GNLP5025</b> Woodyard, Reepham Road, Foulsham</p> <p>(2 additional G&amp;T pitches)</p>	<p>Support site omission</p>	<p><b>Historic England:</b> Object – Unsound We note that this site is an ‘Unreasonable Alternative Site’ and is not currently proposed for allocation.</p> <p>Whilst there are no designated heritage assets within the site boundary, there are a number of designated heritage assets nearby including Old Hall Farm Boundary Wall (grade II listed), Old Hall Farmhouse (Grade II*) and Manor Farm House (grade II) as well as the Foulsham Conservation Area approximately 200 metres to the west (not 1km as the Site Assessment suggests). The development has the potential to impact the significance of these heritage assets via a change in their settings.</p> <p>Before any further consideration for potential allocation we would expect a Heritage Impact Assessment to more fully consider the likely impacts on heritage, the site’s suitability and any mitigation required.</p>	<p><b>Historic England</b> Support noted. The site is not proposed to be allocated and thus expand the existing site.</p> <p>Include an errata to the Site Assessment to state a factual correction as per the HE comment clarifying that the Conservation Area is approx. 200 metres to the west and therefore, development would have the potential to impact the significance of these heritage assets via a change in their settings.</p>	<p>Include an errata to the Site Assessment to state a factual correction as per the HE comment clarifying that the Conservation Area is approx. 200 metres to the west and therefore, the development has the potential to impact the significance of these heritage assets via a change in their settings. Consequently, an HIA would be required to inform the suitability of the</p>

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		<p><i>If further consideration for potential allocation, then we would recommend an HIA is prepared to inform the suitability of the site and policy wording.</i></p> <p><i>Amend distance to the conservation area which is approximately 200 metres, not 1 km.</i></p>		site if the site was considered further.
	Support site omission	<p><b>Foulsham Parish Council</b> agrees that this site should not be included in the plan for the reasons already published, specifically that it is situated on an acute bend and the resulting increase in vehicle movements would be dangerous. Doubling the number of pitches would double the number of vehicles entering and exiting the road directly on a blind bend. Safety of this</p>	<p><b>Response to Parish Council</b>          Whilst not all the points raised by the Parish Council are considered to justify the omission of GNLP5025, the Partnership shares the</p>	No changes

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		<p>section of road is further compromised by the fact that it is already prone to large amounts of surface water runoff from the adjacent land and adding further areas of hardstanding will only contribute further to the issue.</p> <p>The Parish Council has been approached by a number of residents who have voiced their objections to this proposal on the grounds of safety, environmental pollution, waste disposal and threat to flora and fauna. The Parish Council shares these concerns.</p> <p>It is also noted that the parish already has a disproportionate number of travellers sites and the Parish Council is very concerned that planning infringements on other sites are not being appropriately challenged. Until there is effective enforcement of planning breaches, we do not feel that it is appropriate to consider further development of such sites.</p>	<p>concern about highway safety, and has omitted the site for that reason.</p>	
	<p>Support site omission</p>	<p><b>Members of the Public</b>  Objects to the inclusion of the site due to:</p> <ul style="list-style-type: none"> <li>Lack of space within the site for turning vehicles</li> </ul>	<p><b>Response to public comments</b>  The Partnership has not proposed to omit or</p>	

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		<ul style="list-style-type: none"> <li>• Brandhip is a dangerous corner, where a number of accidents and near misses have taken place. (Especially in Winter when the hill is icy)</li> <li>• At the Planning Inspectorate meeting it was clearly stated that the second entrance should be blocked (noticed this has been opened and recently gated)</li> <li>• The ancient oak tree on the site is in danger of being permanently damaged</li> </ul> <p>Object to the inclusion of the site as the proposed access point to the new dwellings of Woodyard would be extremely dangerous, as they fall onto a very sharp blind corner of which we have experienced oncoming traffic from Themelthorpe and Foulsham driving across the opposite lane due to the sharpeness of the bend. As being a blind corner, one is unable to see oncoming vehicles until bumper to bumper. Therefore, we feel the access unsuitable.</p> <p>Objects to the inclusion of the sites GNLP5025 and GNLP5026 due:</p>	<p>include sites based on their proximity to each other. Instead, the approach has been to assess sites such as the Oaks (GNLP5022), Woodyard (GNLP5025), and Peddlars Turnpike (GNLP5026) on their own merits.</p> <p>Not all the points raised by members of the public are considered to justify the omission of GNLP5025. Nevertheless, GNLP5025 is not selected for allocation. The reasons as stated in the Site Assessment (H2.2) are to do with the site access and the highway safety concern of it being on a bend on the Reepham Road.</p>	

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		<ul style="list-style-type: none"> <li>• the traveller sites are disproportionate to the size of the local community and/or will dominate it;</li> <li>• the sites have already been expanded without planning permission beyond the level previously decided, on appeal, as being reasonable with stringent conditions;</li> <li>• road safety risk would be increased beyond that which is reasonable and/or manageable;</li> <li>• the risk of environmental impact is significant to the point that it is unreasonable;</li> <li>• the local infrastructure would not be able to absorb the proposed changes; and</li> <li>• the history of misrepresentation and non-compliance of the applicants demonstrates that the actual impact on the community, if approved, would be far greater than that envisaged by the decision makers and, therefore, must be a consideration.</li> </ul>	<p>As to other sites in the vicinity of GNLP5025, these are considered on their own merits and members of the public are referred to other sections of the GNLP's evidence base. For example, the site at Peddlars Turnpike is not selected for reasons to do with the site access, access to services, and the narrow surrounding road network (H2.2). The Oaks (GNLP5022), which is favoured for expansion, is assessed in document H2.1.</p>	
		<p><b>Site promoter</b> Objection from the site from Site promoter who wishes to have the site allocated on the basis that:</p>	<p><b>Response to site promoter</b> Notwithstanding the fact that the current occupiers have 4 vehicles, and that</p>	

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		<ul style="list-style-type: none"> <li>• seeking to permit the use of 4 personal vehicles as opposed to the 7 previously approved. Please see Appeal Ref: APP/K2610/A/11/2161423,</li> <li>• With regards to the safety concerns around access, it was previously determined by the highways authority that the northerly access point did not prove to be of any significant risk.</li> <li>• Despite there having been previously no objections on the basis of vehicle access from the northerly entrance to the site, we are more than happy to fund and install small elements of street furniture such as reflective bollards on our land surrounding the bend in order to increase visibility for passing motorists on “this lightly trafficked section of rural road”(2009/1517)</li> </ul>	<p>the original planning application (20091517) discussed vehicle parking for 6 cars and a light goods vehicle, it is likely that the expansion of the Woodyard site by 2 pitches would result in an increase of vehicle movements from an access which is located on an acute bend of the Reepham Road. The Partnership continues to adhere to its assessment that there is an issue of highway safety that cannot be mitigated and that GNLP5025 is unsuitable for allocation.</p>	

**Comments on GNLP5026 Peddlars Turnpike, Guestwick (New site for 3 G&T Pitches)**

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<p><b>GNLP5026</b> Peddlars Turnpike, Guestwick (New site for 3 G&amp;T Pitches)</p>	<p>Support site omission</p>	<p><b>Historic England –</b> We note that this site is an ‘Unreasonable Alternative Site’ and is not currently proposed for allocation. Object - unsound Whilst there are no designated heritage assets within the site boundary, there are a number of designated heritage assets nearby including Old Hall Farmhouse to the south and Station Farmhouse to the north (both grade II). The development has the potential to impact the significance of these heritage assets via a change in their settings. However, the site is quite well contained and intervening landscaping should limit the impact on the historic environment.</p> <p>The site assessment refers to a 5km radius- is that correct? Should it read 0.5km? <i>Amend radius in SA if necessary.</i></p>	<p><b>Response to Historic England</b> Comment noted. The site is not proposed to be allocated.</p> <p>Correct typo 0.5 km radius instead of 5 km radius in errata to the Site Assessment.</p>	<p>Correct typo 0.5 km radius instead of 5 km radius in errata to the Site Assessment</p>
	<p>Support site omission</p>	<p><b>Comments from members of the Public</b></p> <ul style="list-style-type: none"> <li>• Objects to the inclusion of the site, as it’s located at the top of Pedlars Turnpike is on even narrower roads and on a blind corner. The increase in traffic would, again, inevitably lead to accidents. All these</li> </ul>	<p><b>Response to public comments</b> The Partnership has not proposed to omit or include sites based on their</p>	<p>No changes</p>

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		<p>sites would need water and a system of disposing of their liquid waste, if not already provisioned. There is already too much water being extracted from local rivers.</p> <ul style="list-style-type: none"> <li>• Objection to the inclusion of the site as Peddlars Turnpike is a single rural lane along the whole of its length and contains very sharp almost 90 degree double bend, just beyond the site. Cars travelling in opposite directions cannot pass each other. There are three existing sites on the Foulsham to Reepham Road, the Woodyard, Oaklands and the Oaks. The Oaks is seeking to increase it is on a larger road and less of a rural location so why create a new site at a greenfield in Peddlars Turnpike. Opening a new site at this location would result in 15 pitches (Woodyard 2, (Oakland 3 and Oaks 7 within 1 mile radius of the Oaks). There are not that many residents with the same radius balance and distribution should be an allocation consideration.</li> <li>• Objection to the inclusion of the site Since 2007 we have seen three traveller sites develop in this road. The original plans showed the pitches as being discreet and sensitive to the high quality countryside in which they are situated. Over the 16 year period,</li> </ul>	<p>proximity to each other. Instead, the approach has been to assess sites such as the Oaks (GNLP5022), Woodyard (GNLP5025), and Peddlars Turnpike (GNLP5026) on their own merits.</p> <p>Not all the points raised by members of the public are considered to justify the omission of GNLP5026. Nevertheless, GNLP5026 is not selected for allocation. The reasons as stated in the Site Assessment (H2.2) are to do with the site access, access to services, and the narrow surrounding road network.</p> <p>As to other sites in the vicinity of GNLP5026, these are considered on their own merits and members of the</p>	

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		<p>one of these sites (The Oaks) has developed without permission to a size and dominance that puts it out of balance with the existing countryside. Now we are asked to consider the expansion of one of the other sites, Woodyard, and the development of a new site, less than a mile away at Guestwick Green.</p> <ul style="list-style-type: none"> <li>• Objection to the Inclusion of the site for the following reasons: <ol style="list-style-type: none"> <li>1) There is a sharp corner and a deep ditch between the entrance and the junction leading to Foulsham and Guestwick.</li> <li>2) it is on a narrow lane and is surrounded by narrow lanes.</li> <li>3) The field is a valuable habitat, particularly being low lying and damp.</li> <li>4) It is out of keeping with the existing small community at Guestwick Green.</li> </ol> <p>With both these sites there is a restricted view for traffic.</p> </li> <li>• Objects to the inclusion sites GNLP5025 and GNLP5026 due to: <ol style="list-style-type: none"> <li>1) the traveller sites are disproportionate to the size of the local community and/or will dominate it;</li> <li>2) the sites have already been expanded without planning permission beyond the level previously</li> </ol> </li> </ul>	<p>public are referred to other sections of the GNLP's evidence base. For example, the site at Woodyard (GNLP5025) continues to be considered unsuitable for expansion due to its poor access, as is explained in H2.2. The Oaks (GNLP5022), which is favoured for expansion, is assessed in document H2.1.</p>	

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		<p>decided, on appeal, as being reasonable with stringent conditions;</p> <p>3) road safety risk would be increased beyond that which is reasonable and/or manageable;</p> <p>4) the risk of environmental impact is significant to the point that it is unreasonable;</p> <p>5) the local infrastructure would not be able to absorb the proposed changes; and</p> <p>6) the history of misrepresentation and non-compliance of the applicants demonstrates that the actual impact on the community, if approved, would be far greater than that envisaged by the decision makers and, therefore, must be a consideration.</p>		
	Object to site omission	<p><b>Tom Beer MH Planning on behalf of site promoter</b></p> <p>On behalf of the G&amp;T site promoters which include a family of 2 adults and 3 children occupying council accommodation at Guestwick and attending local schools, living in a house is causing distress to the parents, they wish to relocate to Site GNLP5026 in order to live in a traditional gypsy site attend to their horses on site and avoid travelling twice a day. This would free up a Council house. The intention is (as shown in the map enclosed) for the northern part of the site to remain as paddocks and for the area to the south of the site to the</p>	<p><b>Response to site promoter</b></p> <p>Notwithstanding the promoter's representations, and that it is regrettable to hear of the family's distress over their accommodation situation, GNLP5026 is on a single-track lane near an acute bend, and much of the surrounding road network is similar. This is</p>	

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		<p>3 residential G&amp;T pitches in order for the family to grow. Reference is made to other proposed allocations such as Carleton Road in a similar rural setting and a distance of 2.5 km to nearest village New Buckenham'. Peddlars Turnpike is a narrow single track road with a number of bends and some rutting. Reflecting its rural location, its single track nature, and that it links very small settlements, traffic levels are very low and, in the vicinity of the site access, speeds low. Looking out from the access into the site, sight lines to the south are considerably in excess of standards. It is only looking to the north in the direction of Guestwick Green that it can be claimed that sight lines are below standard. However, precisely because the access comes after two tight bends and the road is single track, most people would struggle to drive at more than 25 mph. On that basis, the Y distance towards the north, which we measured at 52m. is in excess of the required standard which is 45m. for traffic driving at 25 mph.</p> <p>The attached screenshot, which comes from the Crash Map website, shows all slight, serious and fatal collisions in the vicinity of the site and the surrounding area since 1999. It shows that accidents are heavily concentrated on the busiest roads and that for the last</p>	<p>the reason for the site is being considered unsuitable for allocation. The Partnership disagrees that GNLP5026 is comparable to the Carleton Rode sites, and maintains that it has applied a robust and consistent methodology to the assessment of sites.</p>	

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		<p>23 years there have been no incidents of any sort on Peddlars Turnpike or in the vicinity of the site. This confirms that the road's substandard quality naturally constrains traffic flows and vehicle speeds and that the road is relatively safe</p>		

**Comments on GNLP5027 Brick Kiln Road, Hevingham (5 additional pitches to the 1 existing)**

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GNLP5027 Brick Kiln Road, Hevingham (5 additional pitches to the 1 existing)	Support site inclusion	<p><b>Historic England</b> We note that this is a ‘favoured site/reasonable alternative’. There are no designated heritage assets within the site boundary or nearby. No comments.</p>	<p><b>Response to Historic England</b> Comment noted the site is recommended for allocation.</p>	No changes
	Comment	<p><b>Avison Young on behalf of National Gas –</b> The Gas Transmission Pipeline, route: BACTON TO ROUDHAM HEATH crosses the site to the north a Map is included to illustrate this. Therefore, the development will be developed with the following site-specific criteria: <i>a strategy for responding to the National Gas Transmission high-pressure gas pipelines present within the site which demonstrates how the National Gas Transmission Design Guide and Principles have been applied at the masterplanning stage and how the impact of the assets has been reduced through good design.</i>”</p>	<p><b>Response to National Gas</b> The Site policy requirements together with the supporting text in the Gypsy Travellers Sites Additional Focussed Consultation Doc pages 6-7 (H1.2) address this issue. Criteria 3 says: ‘Development will be designed to avoid impacts to and from the underground gas pipeline located just within the northern site boundary.’ The Partnership would not object to modifying the policy if recommended to by the Inspectors, but it is</p>	

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			considered that the policy as drafted is sound and achieves the effect sought by National Gas.	
	Object to site inclusion	<p><b>Hevingham Parish Council</b>  Objects to the site favoured in Hevingham as not only does it fall outside of the development boundary, but it is located on a small country road which raises concerns for the Parish Council with regard to access onto the highway and the inevitable increase in traffic. The Parish Council also have concerns over drainage of the site.</p> <p>The Parish Council would therefore request that the GNLP team look elsewhere for a more suitable location.</p>	<p><b>Response to Parish Council</b>  GNLP5027 has an access on a straight section of Brick Kiln Road, and the addition of 5 pitches will have a modest effect on overall traffic volumes through the parish. Onsite drainage is an issue that can be managed, and the proposed policy for GNLP5027 refers to areas of surface water flood risk (H1.2).</p>	
	Support site inclusion	<p><b>Site promoter</b>  Supports the inclusion of the site as this site is already well used, therefore, can't see it having any further impact on the area.</p>	<p><b>Response to site promoter</b>  The continued promotion of GNLP5027 is noted and the Partnership is now proposing this site for allocation.</p>	

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	Object to site inclusion	<p><b>Comments from the Members of the Public</b> Object to the inclusion of the site due to:</p> <ul style="list-style-type: none"> <li>• the traveller sites are disproportionate to the size of the local community and/or will dominate it;</li> <li>• the sites have already been expanded without planning permission beyond the level previously decided, on appeal, as being reasonable with stringent conditions;</li> <li>• road safety risk would be increased beyond that which is reasonable and/or manageable;</li> <li>• the risk of environmental impact is significant to the point that it is unreasonable;</li> <li>• the local infrastructure would not be able to absorb the proposed changes; and</li> <li>• the history of misrepresentation and non-compliance of the applicants demonstrates that the actual impact on the community, if approved, would be far greater than that envisaged by the decision makers and, therefore, must be a consideration.</li> </ul>	<p><b>Response to public comments</b> The points raised are not considered to justify the omission of GNLP5027. Whilst acknowledging there are some constraints to do with highways, infrastructure and features of the site, these can be mitigated. The size of the site is also not a reason a reason for its omission. If expanded to six pitches, it would still remain a relatively small site, most likely occupied by an extended family group.</p>	
	Object to site inclusion	<p><b>Cobbleacre Park</b> Objects to the inclusion of this site as apprehensive about the impact on our local road infrastructure, which is ill-equipped to handle the anticipated increase in</p>	<p><b>Response to Cobbleacre Park</b> The access to GNLP5027 is on a straight section of Brick</p>	No change

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		<p>traffic that this site would generate. The roads in our area are narrow, lacking officially designated passing places. This deficiency in infrastructure poses potential safety hazards, including an elevated risk of traffic accidents and challenges for emergency vehicles to navigate effectively. Moreover, the augmented traffic flow may result in congestion, inconveniencing residents and potentially impeding the timely operations of local businesses that rely on prompt deliveries and customer access.</p>	<p>Kiln Road and a suitable visibility splay exists. This may be improved with the removal of vegetation. Although there is no footpath provision from the site, and the surrounding road network is narrow in places, this site is suitable and amongst the most favourable of the alternatives assessed by the Partnership.</p>	

Replies to confirm 'no comment'

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<b>Overall Document</b>	Comment	<b>Environment Agency</b> Having reviewed the information and checked constraints for the sites, we have no concerns or comments to raise in relation to this consultation.	<b>Response to Environment Agency</b> Comment noted	No change
	Comment	<b>National Highways</b> We have no further comments to add to our comments issued on 20th March 2023 objecting to GNLP5014.	<b>Response to National Highways</b> Comment noted. GNLP5014 has been omitted from the GNLP.	